

REVISED DRAFT LAMBETH DESIGN GUIDE SPD**SECOND CONSULTATION STATEMENT**

Representations made to public consultation on the Revised Draft SPD between 8 July and 2 September 2022 and officer response. Also included are comments made by the Planning Policy Liaison Forum (PPLF) in April 2023 including ward member from the PPLF in June 2023 and officer response.

R01 - Metropolitan Police Service	R28 – Individual
R02 - National Highways	R29 – Individual
R03 - The Marine Management Organisation	R30 – Individual
R04 - City Planning	R31 – Individual
R05 - Individual	R32 – Individual
R06 - Individual	R33 – Waterloo Community Development Group
R07 - Individual	R34 – Lambeth Village
R08 - Coal Authority	R35 – Individual
R09 - Natural England	R36 – Individual
R10 - Individual	R37 – Individual
R11 - Individual	R38 – Individual
R12 - Child Friendly Lambeth	R39 – Individual
R13 - Optivo	R40 – Individual
R14 - Individual	R41 – Individual
R15 – Ward Member	R42 – Individual
R16 – Port of London Authority	R43 – Individual
R17 - Guys and St Thomas	R44 – Individual
R18 – Ministry of Defence (MOD)	R45 – Individual
R19 – Homes for Lambeth (HfL)	R46 – Individual
R20 – EcoWorld	R47 – Individual
R21 – Historic England (HE)	R48 – Individual
R22 – KMK Architects	R49 – Lambeth Estate Residents’ Association (LERA)
R23 – Individual	R50 – Lambeth Development Management
R24 – Brixton Society	R51 – Lambeth Transport Policy team
R25 – Greater London Authority (GLA)	R52 – Planning Policy Liaison Forum (PPLF) – April 2023
R26 – Coin Street Community Builders (CSCB)	R53 – Ward Member – June 2023
R27 – Individual	R54 – Lambeth Sustainability team (June 2023 report clearance comments)

GENERAL COMMENTS ON WHOLE SPD

Respondent no.	Comment no	Comment	Y or N?	Track change edit
R02 National Highways	1	<p>Thank you for your e-mail of 8th July 2022 inviting National Highways to comment on the above consultation and indicating that a response was required by 2nd September 2022.</p> <p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We have reviewed the Lambeth Design Guide Supplementary Planning Document (SPD) and are satisfied that the consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109).</p> <p>Thank you again for consulting with us and please continue to advise us of other relevant</p>	N	Noted

		consultations via our inbox planningse@nationalhighways.co.uk .		
R03 The Marine Management Organisation	1	Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.	N	Noted
R04 City Planning	1	City Planning act on behalf of several SME housebuilders who operate in the borough, submitting planning application for extensions, conversions and new build developments. As a general comment, we welcome the Draft Design Code SPD. It provides helpful advice. The images and case study examples are particularly useful. Moreover, it provides housebuilders with greater certainty that specific developments i.e. those check marked in the SPD will be supported in principle. Notwithstanding this, we have provided comments below on some of the types of developments where additional guidance would be appreciated. As a general point, it should be recognised from the outset of the guidance that when applying the guidance in the SPD more flexibility should be given to residential conversions than for example a new build development, in recognition that they have to work within the constraints of the existing building.	N	Noted
R6	1	Unsurprisingly the link for response doesn't work.	N	Noted. We have raised this with the consultations team.

		<p>I could not be more unimpressed and angry with the way planning applications are dealt with.</p> <p>Like everything relating to Lambeth Council, there are inadequate staff, and no continuity. Shortcuts and lack of attention from planners have ruined our conservation area and our home.</p> <p>It is just a joke to ask people how they feel about things when it is a given that you will do exactly as you please, ignore any comments and pursue the option that pays best.</p>		<p>We have investigated the weblink issue reported for the Revised Draft Lambeth Design Guide SPD consultation. We have reached the conclusion that there was not a fundamental issue with the consultation approach and that the material was available throughout the consultation period. Whilst there was a limited issue at one point through one of the reminder emails sent, people were provided with an alternative way of communicating their views and indeed some people successfully did this when confronted with the issue. Overall we received a relatively high number of responses for a consultation of this nature, through email and Commonplace. It is not therefore considered necessary to extend the consultation.</p>
R7	1	<p>First of all you should know that the link sent out to respond to the survey does not work. (This is not the first time I have had problems of this kind with Lambeth emails. Replying to the mailbox that sends out consultations does not work as it is unmonitored. Many Lambeth consultations may get few responses because the system is not working efficiently and people will give up rather than try to find a way round it.)</p>	N	<p>Noted. We have raised this with the consultations team.</p> <p>Please see response to R6 above.</p>
R8 Coal Authority	1	<p>Thank you for your email below regarding the Lambeth Design Guide Supplementary Planning Document (SPD) Consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and</p>	N	Noted

		<p>development plans in order to protect the public and the environment in mining areas.</p> <p>As you are aware, Lambeth Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.</p> <p>In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>		
R9 Natural England	1	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p>	N	Noted

		Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.		
R10	1	I'm not an expert in buildings design or development, but I just wanted to urge the Council to put the environment and reduction of carbon emissions at the top of the priority list in absolutely every bit of building work that happens in Lambeth.	N	Noted. We have endeavoured to include all current best practice in this regard.
R11	1	<p>I am a home owner living in Porden Road, Brixton. I write to object to the plan to build new houses/flats on Tesco car park, Acre Lane.</p> <p>My house is already overlooked by the new Civic Centre at the front of my property & I am concerned that any new build on the car park will result in the back of my house being overlooked too, resulting in less light, lack of privacy etc.</p> <p>Also, building 170 new homes would strain essential devices in the area such as schools, surgeries etc which are already stretched.</p> <p>Please take my objection seriously.</p>	N	No further action. The site to which the respondent refers is a draft site allocation in the Council's draft SADPD which is still under consideration. It is not part of the Design Guide.
R13 Optivo	1	Optivo is pleased to participate in the consultation on the Revised Draft Lambeth Design Guide Supplementary Planning Document (draft SPD). We are a housing association with a proven track record of delivering high quality, sustainable schemes throughout London, the South East and the Midlands. We take pride in our	N	Noted.

		<p>work and aim to engage positively with communities throughout our operational area. We are supportive of Lambeth's vision and proactive approach to achieving high quality design. There are a number of positive aims and objectives within the draft SPD which will help ensure the delivery of well-designed developments. Our specific comments are set out below:</p> <p>General Comments</p> <p>- we welcome the provision of web links to additional information and guidance (e.g. page 34, links to pre-application advice). For Lambeth's own documents provision should be made to ensure that the documents remain at the same links, or redirections are put in place as required. This will ensure that information remains easily accessible for users of the SPD.</p>		
R15	1a	<p>Good to see this important document out for consultation. Maybe if the consultation was promoted more and outside summer holiday period it might have got more feedback. There are less than 5 responses on Commonplace.</p> <p>But only 7 individuals (were any cllrs?) commented on 2020 draft version of Design Code. Perhaps it is seen to be too much of a technical document to interest many people & organisations.</p>	N	<p>The consultation period was extended from a 4-week statutory length to 8 weeks to account for the summer break. The consultation ran from 08 July 2022 to 02 September 2022. The consultation approach followed that outlined in the Council's Statement of Community Involvement 2015.</p>

R15	2	Can you explain how this SPD works alongside the Local Plan? And its materiality? Is it a fuller explanation of the Local Plan policies or filling in policy gaps or a definition of “good design” (a subjective concept). The use of “must” “prioritise” “consider” “where required” “retain” “ensure” etc do not make a consistent definition of what information should be included, what has to be considered and what must be complied with for an acceptable planning application,	N	The guidance is written to support/ explain the policies in the Local Plan 2021 and help users understand what the policies are trying to achieve. The information required within a planning application is set out in separate documentation.
R15	3	Should the document include a how to use section? The Guide should be easily understood by those with no technical expertise or knowledge (para 5.124). It seems mainly, but not exclusively, to be about housing	N	The introduction in part 1 sets out how the document works. Each part will be uploaded separately on the website with an introduction on the web page explaining its content.
R15	4	Overall points I am concerned that no disabled groups commented on previous 2020 draft. And that in the 2022 draft only one mention of “disabled users”	N	In accordance with the Council’s Statement of Community involvement, the full consultation list of stakeholders on the Planning Policy Database was notified.
R15	5	Why is there no guidance on good design for Fire safety	N	This matter is already covered by the building regulations. Additional content is not required in this design guide.
R15	6	Is eliminating render /stucco a Lambeth policy?	N	Since 2015 planning policy has discouraged the use of render and stucco on building facades because it is not durable and places a high maintenance burden on the property owner. See Policy Q5 of the Local Plan.
R17 Guys and St. Thomas	6	Site Allocations Development Plan Document (DPD)	N	Noted

		<p>The draft Site Allocations DPD outlines several allocations which includes St Thomas' Hospital (Proposed Site 2: St Thomas' Hospital SE1). The vision of this allocation is the optimisation of development on this site which will provide an opportunity to deliver enhanced clinical care facilities and to contribute to the growing SC1 Life Science and MedTech health cluster in the Waterloo Opportunity Area. The allocation also outlines opportunities to improve the townscape character and pedestrian experience along Lambeth Palace Road, in conjunction with the development of the Royal Street site.</p>		
R18 MOD	1	<p>The area covered by Lambeth Design Guide is washed over by a Birdstrike Safeguarding Zone that is designated to preserve the operation and capability of defence assets at Kenley Airfield. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.</p> <p>Within any new Design Guide, policies and the reasoned justification supporting them should, ideally, refer to the presence of safeguarding zones and/or provide a developer with an indication as to potential limitations that might apply to certain development types. This could be simplified by a policy requirement that any development assessed by MOD to have a detrimental impact on the operation and capability of defence sites or assets will be refused. This could be supplemented with a clause that suggests that in some situation's mitigation</p>	N	<p>Noted.</p> <p>Policy relating to Birdstrike Safeguarding Zone can be added to the Lambeth Local Plan at its next review.</p> <p>Due to Lambeth's urban and largely residential character the likelihood of proposals coming forward for the creation of areas of open water storage, wetlands or any schemes that might result in the creation of attractant environments for large and flocking bird species is very limited.</p> <p>For the reasons outlined above the inclusion of specific guidance on this matter is not considered necessary at this time.</p> <p>In addition, where Lambeth has existing areas of open water or wetlands in the borough, they are relatively small and there are no known plans to expand / change them in such a way that they would prove attractive to large numbers of flocking birds. Indeed, where the Council manages the sites it is working to make them of less interest to large numbers of flocking waterfowl and designing</p>

	<p>may be possible, though this will be assessed by MOD on a case-by-case basis. It may also be necessary in certain circumstances for MOD to require the removal of permitted development rights where the use of these rights introduces elements that would not be compatible with MOD safeguarding requirements.</p> <p>To provide an illustration of the various issues that might be fundamental to MOD assessments, a brief summary of birdstrike safeguarding zones is provided.</p> <ul style="list-style-type: none">• Zones with a radius of 12.87km is designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within these zones development that has the potential to provide an attractant environment to certain large and/or flocking bird species hazardous to aviation safety may be subject to design requirements or for management plans to be applied. In terms of design requirements or limitations, it may be necessary that attenuation basins are designed to drain to dry within a given time period, that islands and promontories are removed from pond designs, or that bird management plans are applied in certain circumstances and may be secured by planning obligation. This can apply, amongst other things, to sustainable drainage systems or to any form of	<p>them to favour wild birds species which are smaller in both size and flock numbers.</p>
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		<p>development incorporating open water storage or wetland.</p> <p>In summary, the MOD have no concerns with the Lambeth Design Guide SPD but would emphasise that if development is proposed including open water storage, wetlands or any schemes that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation that fall within the birdstrike safeguarding zone associated with Kenley Airfield, then consultation with the MOD should take place. Policy wording that alerts developers to this potential would be welcomed.</p>		
R20 EcoWorld	1	<p>EWL welcomes the preparation of the draft Design Guide SPD; it reflects the national recognition of the importance of securing high design quality in development and creating beautiful spaces. The NPPF is clear at para. 125 that such “...<i>design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.</i>”</p> <p>The draft Design SPD as currently drafted operates largely effectively as a companion to the 27 existing design and other relevant policies within the adopted Lambeth Local Plan and, read alongside those relevant policies within the 2021 London Plan, sets an appropriately high bar for new development.</p>	N	Noted
R24 Brixton Society	1	<p>We welcome that a number of improvements have been made to the SPD since we commented</p>	N	Noted

		on an earlier draft in April 2020. However, there are still some weaknesses and ambiguities that must be addressed, as detailed under individual sections below.		
R24	2	Overall, almost all architects, designers and householders will be referring to this document online. Unfortunately, the layout is still somewhat over-designed, with superfluous section divider pages.	N	The layout has been reviewed and, where possible, superfluous pages removed. Section divider pages have been retained as there are useful markers for those scrolling through the document.
R24	3	Probably the greatest need is for a comprehensive index, because although there are useful checklists and much sound advice, it is easily missed if readers only follow those of the 5 sections that they think are most relevant to their case. The index should pick up all relevant building types, parts and materials.	N	The final version of the SPD will be a web based document in PDF form which will allow users to find content using word searches. For that reason a traditional index is not considered necessary.
R25 GLA	1	The GLA welcomes the Borough's efforts to provide additional design guidance to ensure high quality and sustainable design across LB Lambeth. The document would be considered as design guidance, not a design code, in line with the National Design Code definition. The GLA suggest that titles are updated to reflect this throughout the document, or the document is amended to align as a design code.	Y	Accepted. All titles referring to 'Design Code' have been revisited
R25 GLA	2	There will still be a requirement to undertake further design studies as part of any future local plan to meet the requirements of the LP2021 (i.e. Characterisation Study, Site Capacity Study and an updated Tall Building Study). We look forward to	N	Noted

		working with the Borough on these documents in the future.		
R25 GLA	3	Whether in this, or a subsequent document, it is recommended that LB Lambeth follow a similar approach to that detailed in the Characterisation and Growth Strategy, Optimising Site Capacity: A Design-led Approach and Small Site Design Codes LPGs. GLA officers would welcome the opportunity to discuss these further with borough officers to align LB Lambeth's approach with the LP2021.	N	Noted
R25 GLA	4	Confirm the intentions of this document to form as a Design Code of Design Guidance. Update the document to reflect this under the national definition as determined. anticipated status of the document and re-phrase to suit.	Y	Accepted. All titles referring to 'Design Code' have been revisited.
R25 GLA	6	The use of visual graphic material beyond photo collages (i.e maps, diagrams) would support the guidance provided in the document. Providing a more legible and accessible policy document to be utilised in the planning and development process.	N	Photographs of good and bad examples are considered the most useful and cost-effective means of illustrating the document content. It should be noted that this SPD is not policy.
R33 Waterloo Community Development Group	1a	We welcome much of this 2nd draft SPD, although our community would have benefited had it been alerted to this earlier than within the past week.		Noted

PART 1 – INTRODUCING LAMBETH

Respondent no.	Comment no	Comment	Y or N?	Edit
R25 GLA	7	Unclear how public engagement influences the development of the document. – include reference to engagement with stakeholders, including landowners and neighbourhood forums.	Y	<p>Accepted. The introduction has been amended to explain the preparation process.</p> <p><i><u>‘1.5 The preparation of this SPD included two stages of 8-week public consultation periods to provide an opportunity for the community and stakeholders to provide comments. The accompanying consultation statement is on the Council’s SPD webpage, it sets out who was consulted, a summary of the main issues raised and the council’s response to comments.’</u></i></p>
R53 Ward Member	9	Challenges 1.5 – 1.6 no mention of Circular Economy principles, and the need to address these early in decisions about the brief and in pre-app discussions.	Y	<p>Accepted. Paragraph 1.6 amended:</p> <p><i>1.6 Tackling the climate emergency by reducing emissions from buildings and transport, and making the built environment resilient to future climate change is a major challenge. Air pollution remains at dangerous levels across the borough, with legal limits regularly exceeded with significant impacts on public health. In response to the significant threat posed by climate change, Lambeth Council declared a climate emergency in January 2019. <u>Adopting circular economy approaches will play a significant role in addressing the challenge of the climate emergency.</u></i></p> <p>See also response to R53 Comment 11</p>

R41	8	Pg 4 - 'Comply or justify' principle should IMO also have limited weight where it relates to impacts on amenity and outlook of neighbouring residential properties to a development.	N	In circumstances where comply or justify approach is used in relation to the guidance content it will be for the LPA to assess the applicant's submission against the policy requirements. Comply or justify does not override the policy position.
R26 CSCB	1	<p>Paragraph 1.8 of Part 1 of the Design Guide states: <i>'The guidance in this SPD has been produced on the 'comply or justify' principle. Applications which comply with the principles and practice set out in the five parts of this SPD are much more likely to be successful than those that do not. That said, where a proposal departs from any of the principles and practice outlined in the guidance, the onus will lie with the applicant to provide a convincing justification on why deviation is acceptable in that instance. The case should be made within supporting documents such as the Design and Access Statement, Heritage Statement or Planning Statement submitted with the application and supported by any evidence necessary to make a persuasive case.'</i></p> <p>However, the Department for Levelling Up, Housing & Communities' 'Guidance on plan-making', updated in 2021, clarifies: <i>'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.'</i></p> <p>In this regard, there is no requirement to 'comply' with SPDs but to have regard to the guidance and advice in such documents. Paragraph 1.8 should be reworded to reflect this.</p>	Y	See R41 Comment 8
R13 Optivo	2	Part 1	Y	Accepted. Document updated.

		- Pages 5, 20 and 30 – reference is made to the earlier title: “Draft Design Code SPD” (side panel).		
R25 GLA	8	The overarching objectives of the NPPF, should be drawn into the Design Guidance SPD to provide certainty and clarity on area wide design guidance, in line with the NMDC.	N	<p>Part 1 page 6 National Policy Framework already provides reference to the NPPF as below.</p> <p><i>“To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified”</i> (Para 126, NPPF)</p> <p>We have also included link to the NPPF</p>
R54	1	Section 1, page 8, section 1.11 typographical area: should read ‘Buildings age’ not ‘Building sage’.	Y	Accepted. This typographical error has been corrected through the proofreading process.
R53 Ward Member	15	Part 1 1.12 BRE guidance 2011 superseded by 2022 guidance	Y	We have updated text to latest guidance.
R13 Optivo	3	- Pages 6-11 provide a useful overview of various documents and guidance. Whilst the National Design Guide 2021 is discussed on	N	Accepted. Document updated to include a brief reference to the NMDC. A summary is not considered

		page 8, there aren't any references to the National Model Design Code (NMDC). A summary of the NMDC and confirmation that the draft SPD has been prepared in accordance with it's aims, will help add weight to the draft SPD.		necessary given the nature of this document. We have added point 10 to para 1.13 <u>'National Model Design Code (2021) provides detailed guidance on the production of design codes, guides and policies to promote successful design.'</u> https://www.gov.uk/government/publications/national-model-design-code'
R15	7	Part 1 Introducing Lambeth Para 1.14 Where are the guides to designing for disabled people? The words "Disabled" and "disability" do not appear once in Part 1. One page in Part 2 called Inclusive Environments is not enough	N	Noted. This is a specialist area in its own right on which a raft of guidance has been prepared by other organisations. It is not the role of this guidance to duplicate that work. Part 1 of the SPD provides link Part M of the building regulations which sets out building regulations for access to and use of buildings, in dwellings and buildings other than dwellings and provides a baseline for accessibility in the built environment. Part 2 of the SPD provides links to further guidance on public realm such as: Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014) Expanding London's Public Realm Design Guide (2021)
R19 Homes for Lambeth	2	National Standards and Regulations / Daylight and Sunlight Page 9 of the SPD summarises the standards and regulations which will be relevant in informing development proposals. Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice BR209 (2011) is referenced. The expectations of this document are summarised in further detail in part 2, page 12.	N	Noted.
R19 Homes for Lambeth	3	It should be noted however that the BRE recently updated its guidance in respect to daylight and sunlight and the SPD should now refer to the BR209 (2022 Edition). In addition, the BRE guidance is written in a way which provides flexibility in application of the	Y	Accepted. The reference has been updated to reflect the latest BRE guidance.

		sunlight and daylight factors taking into account a site's location and specific characteristics It is suggested that the SPD is updated to reflect this new guidance and the objectives and inherent flexibility contained within it.		
R26 CSCB	2	<p>Paragraph 1.12 of the Design Guide refers to: <i>'1. Site layout planning for daylight and sunlight: a guide to good practice - BR209 (2011) gives advice on site layout planning to achieve good sun lighting and daylighting, both within buildings and in the open spaces between them and can be used to support right to light planning.</i></p> <p>As of June 2022, BRE best practice guidance for daylight and sunlight (2011) has been superseded, as well as BS 8206-2: 2008 guidance for internal daylight and sunlight in new build. The SPD needs to be updated accordingly.</p>	Y	Accepted. The text has been updated to reflect the current best practice documents.
R25 GLA	11	<p>Pg10 Amend the wording of the header 'London Plan Policy</p>	Y	Accepted.
R25 GLA	12	<p>Pg 10-11 The Good Growth Suite of documents do not form as adopted guidance –Lambeth should note that the Mayor has published relevant draft London Plan Guidance documents which should be consulted in reference to the above – particularly the Characterisation and Growth Strategy LPG and the Optimising Site Capacity: A Design Led Approach LPG which are currently out for consultation (https://consult.london.gov.uk/designandcharacterisationguidance). These would help both characterise the surrounding context and offers clues regarding potential approaches to revitalisation.</p>	Y	Para 1.15 has been updated accordingly links added links to the Characterisation and Growth Strategy LPG and the Optimising Site Capacity: A Design Led Approach LPG on pg 11.
R25 GLA	5	Structure of the design guide could make some specific reference to the Good Growth objectives set out in the LP2021	Y	Accepted. Part 1 of the SPD sets out the policy framework which underpins the guidance with

				reference on page 10 to the LP2021. We have amended 1.15 to reference Good Growth objectives. <u>1.15 The London Plan 2021 sets out six Good Growth objectives for London's growth. Applicant teams should consider how their proposals are helping to deliver the objectives below:</u> <ul style="list-style-type: none"> • <u>Building strong and inclusive communities</u> • <u>Making the best use of land</u> • <u>Creating a healthy city</u> • <u>Delivering the homes Londoners need</u> • <u>Growing a good economy</u> • <u>Increasing efficiency and resilience</u>
R25 GLA	9	The draft Lambeth Design Guide could make some specific reference to the Good Growth objectives set out in the LP2021. This may help to provide a strategic context for the Lambeth Design Guide, setting the aspirations for Lambeth within the overall spatial strategy and approach to development promoted in the LP2021.	Y	Para 1.14 directs reads to the suite of 'good growth' documents. We have added a brief introduction to that section. See response to R25 comment 5.
R25 GLA	10	LBL should note that the Mayor has published relevant draft London Plan Guidance documents which should be consulted in reference to the above – particularly the Characterisation and Growth Strategy LPG and the Optimising Site Capacity: A Design Led Approach LPG which are currently out for consultation (https://consult.london.gov.uk/designandcharacterisationguidance). These would help both characterise the surrounding context and offers clues regarding potential approaches to revitalisation.	Y	The document has been revised to include links to these documents on pg 11
R53 Ward Member	1	1.16 The DG link is to the GLA 2020 draft guidance; this was superseded by the 2022 second draft guidance and last week by the adoption of the final LPG. These are extensive and have changed	Y	Accepted. The GLA provided a response to the second stage consultation of the Draft Revised Design Guide. See response to comments made by R25 GLA specifically R25 Comment numbers 5, 9, 10 and 12.

		considerably from the 2020 first draft: we're not confident that these adopted LPGs are properly reflected in Lambeth's DG		We have updated the links to the latest adopted guidance on the GLA website.
R53 Ward Member	2	Public London Charter (LP policy and LPG) is not referenced anywhere	Y	Accepted. The Public London Charter LPG is referenced in Part 2 of the SPD. See response to R25 GLA comment 15
R53 Ward Member	3	1.28 Optimising Sites – no reference to the GLA 'Optimising Site capacity, A Design Led Approach' LPG adopted 08/06/23	Y	Accepted. See response to R53 Comment 1.
R16 Port of London Authority	1	Welcome that the first section on 'introducing Lambeth' includes a number of specific references to the River Thames and its importance to the character of the borough. The PLA supports the statement on page 13 that along the Albert Embankment and Queen's Walk and the River Thames which fall within the immediate setting of the Westminster World Heritage Site, that in these locations designers should avoid harm and seek improvements upon the current situation.	N	Noted.
R13 Optivo		- Pages 12-19 – we welcome the inclusion of the references (yellow circles) to relevant policies in the Lambeth Local Plan 2021. An explanation regarding the meaning of the yellow circles would be useful on page 12 (with reference to the full list of policies on page 16). This will help ensure that the document remains clear for all users of the guidance.	Y	Accepted. Document updated. We have added para: <u>'1.22 Throughout the 5 parts of this SPD, the Lambeth Local Plan Policy symbol is shown next to the section which is relevant to it as a circle with policy reference. A full list of Lambeth Local Plan 2021 policies is on pg16.'</u>
R33 Waterloo Community Development Group	6	Characterisation of Albert Embankment (para 1.24) This characterisation misses out on the horizontality of the buildings along AE between Black Prince Rd and Lambeth Bridge, especially the listed 1936 LFB HQ, but also the IMO building and Parliament View – in fact only Westminster Tower could be considered vertical in this entire stretch. This has a different character from the 'organ pipes' further along Albert Embankment.	Y	This is intended as a very 'broad brush' summary. The conservation area statement provides much more detailed narrative. However, the text has been amended to read: <u>'1.30 South of Lambeth Bridge the character of development on either side of the river is quite varied. Some buildings, like the fire brigade headquarters, have broad, linear forms. In the composition of the new developments along Albert Embankment a</u>

				<p><i>building form of 'organ pipes' has developed which has allowed for a modulation of heights within developments, opened up gaps between buildings and allowed the creation of new public realm. This approach unifies the buildings and should be perpetuated in new development. A palette of pale grey and white coloured cladding gives a degree of harmony whilst allowing the buildings to express their own individual character. Surviving Victorian buildings on Albert Embankment are important survivors of the area's industrial past and protected by conservation area designation.</i></p>
R26 CSCB	3	<p>Paragraph 1.20 uses the language: 'should ensure that'. However, the associated policy in the Lambeth Local Plan, Q24 uses the language: 'should be able to show that their proposals'. The former is more onerous and so needs to be amended to reflect the policy wording; SPDs cannot change or add to policies.</p>	Y	<p>The text has been amended. <i>'1.26 The significance of high concentration of heritage assets along the River Thames, and the contribution it makes to their settings and to the character of the city as a whole, should not be underestimated. In this regard designers should ensure be able to demonstrate that new developments take a contextual response in terms of their form and materials...'</i></p>
R53 Ward Member	17	<p>1.20 "generally" creates an exploitable 'get-out'; we are surely seeking excellence from any buildings along the river, which by definition are visible across long distances and are surrounded by exemplary buildings? The guidance should set out the most salient elements of excellence expected of riverside sites</p>	Y	<p>Accepted paragraph 1.26 amended: <i>1.26 The significance of high concentration of heritage assets along the River Thames, and the contribution it makes to their settings and to the character of the city as a whole, should not be underestimated. In this regard designers should be able to demonstrate that new developments take a contextual response in terms of their form and materials. Generally aNew development should be subordinate in character <u>respect context</u> so that landmark riverside buildings and heritage assets retain their established presence within the cityscape.</i></p>

R53 Ward Member	18	1.24 "Surviving Victorian buildings on Albert Embankment are important survivors of the area's industrial past and protected by conservation area designation." The much fought over listed 8 Albert Embankment (former LFB HQ) is not Victorian... The text should be less narrow, maybe "Victorian and interwar buildings"?	N	The London Fire Brigade Building is already referred to in the paragraph (now 1.30) acknowledging that the character south of Lambeth Bridge is varied. This building is also Grade II listed and as such is protected.
R13 Optivo	4b	- Pages 17-18 – both pages include Figure 4.	Y	Accepted. Document updated.
R53 Ward Member	10	Part 1 Fig 4 – proposes "extensive opportunity" for demolition and redevelopment across all the borough apart from Cons Areas – this does not reflect CE principles.	Y	Accepted we have revisited figure 4 amended the image.
R19 Homes for Lambeth	1	HfL supports the principles and objectives of the SPD in seeking to establish a pattern of growth across the Borough which will make the best use of land and accommodate new homes and jobs. In particular, the SPD identifies, in broad terms, that the south of the Borough provides the most 'extensive opportunity' for all forms of residential development including residential conversions, extensions, demolition and redevelopment of existing buildings and infill development (part 1, p.18). Central Hill Estate is located on the	N	Noted.

		southern boundary of Borough and it is agreed that the estate has the potential to deliver all of these residential development options subject to the outcome of the Options Appraisal.		
R33 Waterloo Community Development Group	7	Character (para 1.32-9): Figure 5 (from Historic England) strangely fails to identify the medieval town/high street that is Lower Marsh (and is identified as such in the plaque on the Marsh)	N	Noted. This level of detail is considered unnecessary.
R33 Waterloo Community Development Group	7a	Figure 6 'Lambeth Character Zones' there is no explanation of this, such as the use of colours	N	Upon reflection figure 5 (now figure 7) is considered adequate so figure 6 has been deleted.
R41	9	Pg. 22 - There is no sense to the colouring of Fig 6 Lambeth character zones. Is there a key or any reason for the tones? If not it would be clearer as a flat colour.	N	Upon reflection figure 5 (now figure 7) is considered adequate so figure 6 has been deleted.
R33 Waterloo Community Development Group	7c	<p>"The most prevalent building type in Lambeth is the pre-1900 terraced house". This is certainly not the case in Waterloo, nor in Vauxhall, Stockwell or the Oval, where social housing blocks predominate, nor in parts of Streatham, where private mansion blocks mix with social housing blocks. The amount of social housing in Waterloo was over 60% until recently, and is still over 40%, but virtually all of the 60% is in blocks of flats.</p> <p>Much more needs to be said about these as built form as guidance for their on-going improvement and regeneration – particularly given the fact that the residents of them have far less influence over their improvement and regeneration than the residents of terraced housing.</p>	N	The vast majority of alterations proposals relate to terraced properties. By their nature purpose-built blocks of flats offer little opportunity for extension. The guidance content reflects this. Much of the guidance on building alteration and sustainability is relevant to all building types.
R15	8	Lambeth's positive characteristics (para 1.40) No mention of Lambeth's cultural diversity	N	Noted. This section relates to built form characteristics. It is not considered necessary in the design guidance to undertake a detailed

		There needs to be a discussion of Lambeth's changing place in London. What sort of people attracted to live in the borough. Is the churn changing? The impact of massive expansion in east London. Other relevant topics should mention the history of public transport -lack of tube in south. And the role of the south circular dividing the borough. Also the "villages" of Lambeth.		characterisation study. That is a separate piece of work in its own right.
R33 Waterloo Community Development Group	8a	<p>Lambeth's positive characteristics (1.40-8)</p> <p>1.40 – it is the quality of the communities which makes life in any part of the city a positive one: the built form contributes to this, but there is so much more, and the protection and enhancement of local communities is the first step in improving the built environment</p> <p>1.41 – increasing densities across London is a very localised affair: while the Opportunity Areas of Waterloo and Vauxhall have increased density significantly, Kennington or Tulse Hill have not. Is this a good thing?</p>	N	Noted. Given the document provides design guidance it would not be appropriate to expand the content into the area of local community development.
R33 Waterloo Community Development Group	8b	1.42 – significantly increasing densities also brings challenges to avoid negative impacts on the character of an area, such as access to daylight in homes, access to sunlight and sky in the public realm, access to calm streets and pavement, and avoiding any sense of enclosure. this is particularly true in the north, where a huge increase in visitors and commuters, and the development of a night-time economy is impacting on the everyday lived experience of residents such as through pavement stress (the recent LTN in The Cut is an example of the necessary radical changes to accommodate the huge increase in pedestrians). Radically higher denser development can sterilize the character of an area, such as at the Shell Centre, and needs to be avoided.	N	Noted.

R33 Waterloo Community Development Group	8c	Repurposing, retrofitting and extending existing buildings using sustainable materials should be the starting point for most intensifications to raise densities, both to preserve and reinforce existing character whilst also addressing the climate emergency in acknowledging embodied energy and minimizing the use of materials which generate high CO2 emissions, such as concrete.	N	This is addressed elsewhere in the document.
R33 Waterloo Community Development Group	8d	Furthermore, incremental intensification should be focused where there is the transport node capable of supporting increased densities, such as around the four Clapham stations - the new library and leisure pool developments being examples.	N	Noted.
R41	10	Paragraph 1.47 is be largely ignored by developers in Lambeth as they propose new buildings up to just under 45m and seek to justify it by stating that they are "optimising development". The wording in paragraph 1.44 to 1.47 needs a stronger emphasis on proposed building heights to be aligned with existing building heights unless there is valid evidence that it will not cause unacceptable harm to context and existing residents amenity.	N	Advice on tall buildings is provided in Part 2.
R15	9	Para 1.48 Lambeth's green character is due to mature street trees towering over the buildings.	N	Noted.
R19 Homes for Lambeth	4	<p>Lambeth's Positive Characteristics</p> <p>The SPD recognises that the quality of the built environment has developed over time as a result of a combination of factors. It states that new developments should respond positively to their local and borough contexts. It goes on to states that areas which can support "higher densities are where there is a variety of typologies and dense character already exists (part 1, p.23)"</p> <p>HfL agrees that new developments should respond to their context particularly where heritage assets are present. However, London Plan Policy D3 states that "higher density development should</p>	Y	<p>Accepted the text has been amended.</p> <p><i>'1.51 In general, areas which can support higher densities are where there is a variety of typologies and dense character already exists <u>and as London Plan Policy D3 states "higher density development should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling."</u></i></p>

		<p><i>generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.”</i></p> <p>Whilst HfL support the position that areas of dense character can accommodate higher densities, Policy D3 makes clear that the criteria for defining areas of higher density is focused around well connected areas of amenities and infrastructure. Therefore, the statement within the SPD does not accord with the development plan policy and it is suggested that reference is made to Policy D3 to ensure consistency with the development plan.</p>		
R33 Waterloo Community Development Group	7b	<p>North/ Middle/ South: these areas are significant in terms of differing guidance, so it is vital that their exact demarcation is given. Is the South everything south of the South Circular? Is the North everything within the congestion charge area?</p> <p>This needs to be explicit</p>	N	The north, middle and south images are intended only to give a flavour of the borough’s character. They do not relate to designated zones or policy areas.
R15	10	Para 1.55 Include excellent examples of high quality semi-detached housing in Lamberhurst Rd & Greenhurst Rd.	N	Noted. However, inclusion of reference to those properties is not considered necessary in this instance.
R53 Ward Me mber	11	1.62 Circular Economy principles should be mentioned here + Design Review process.	Y	<p>Accepted. Added new point 4 to para 1.69 : <u>4. Mayoral Guidance on the Circular economy (CE) should inform the design from an early stage</u> Added new paragraph 1.72: <u>Design review is most effective when it takes place at an early stage in the planning process, before design proposals become too fixed. Suitable schemes will be referred to the Lambeth Design Review Panel following initial preapplication meetings with Council officers.</u></p>

Built Heritage				
R24 Brixton Society	4	<p>3.1 Built Heritage (paras. 1.58-1.60)</p> <p>With regard to Conservation Areas, it is important to understand that these may be either:</p> <ul style="list-style-type: none"> •Unified groups of buildings surviving from past developments. In the case of larger conservation areas, two or more such groups may be found within the same area. •Diverse groups of buildings, such as historic town centres, distinguished by their variety but nevertheless consistent in scale. •Based on an open space and the buildings surrounding it. As with registered parks and gardens, the presumption should be against major development within the open space. Surrounding buildings should not dominate or overshadow the original open space. 	N	Noted. This level of detail is not considered necessary within this section. Detailed character appraisal documents are being prepared for each conservation area.
R25 GLA	13	<p>Pg 32</p> <p>There does not appear to be sufficient consideration given to heritage assets within the Area. Could refer to a map of Statutory or Locally listed buildings, Conservations Areas and Protected Views. As mentioned in Policy HC1 of LP2021 which states that development plans and strategies should utilise the heritage significance of a site or areas in the planning and design process.</p>	N	This is only an introductory overview. The section on building alterations and extensions contains has specific advice on how to approach the alteration of heritage buildings and the basements section has content on this matter too.
R21 Historic England	1	<p>Part 1: Introducing Lambeth, Planning Policy Context section - built heritage is discussed but misses potential for archaeology to inform design through possible preservation in situ issues or previous uses to be reflect in new design. We recommend that this is included in the SPD.</p>	Y	<p>A reference to archaeology has been added.</p> <p><u><i>'1.66 Archaeological sites should be considered early on in the planning and design process of all projects to inform design through possible preservation in situ issues or potential to reflect previous uses in previous in new design. There are a number of Archaeological Priority Areas in Lambeth which are included in the local heritage list:</i></u></p> <p><u><i>https://beta.lambeth.gov.uk/planning-and-building-control/conservation-and-listed-buildings/locally-listed-buildings/find-out-if-asset-local-heritage-list</i></u></p>

R25 GLA	114	Pg33 Titled: Draft Design Code SPD – The intentions of this document to form as a Design Code or Design Guidance should be confirmed and the document should be amended to reflect this. Should note the National Design Code definition.	Y	The margin title has been corrected
R15	11	Para 1.61 which buildings in Lambeth have been subject to a post-occupancy evaluation? And how do Planning Officers learn from these examples?	N	Whilst no formal post occupancy evaluation has been undertaken conservation and design officers regularly visit completed schemes and informally monitor outcomes to learn lessons. Pre-pandemic design tours with the Planning Applications Committee were also undertaken to inspect completed schemes. This is something we hope to begin again in 2023..
R53 Ward Member	19	1.62 “Consider meaningful engagement with the local community at pre-application stage” should read “Undertake meaningful engagement with the local community at pre-application stage”	N	No statutory or policy requirement for developers to engage with communities therefore guidance can only encourage this.
R33 Waterloo Community Development Group	9	Design Process – Applicant’s Role Applicants shouldn’t just “consider meaningful engagement with the local community, they must undertake meaningful engagement with the local community early in the pre-app stage using existing community structures wherever possible, such as neighbourhood forums, resident's associations and BIDs	N	Noted. The guidance can’t over-step the policy position on these matters. That is why it is encouraging rather than prescriptive.
R15	12	Para 1.68 which applications require 50cm of obscured glass? Legible streets require blocks to have numbers not just names.	N	Para 1.68 includes examples of design conditions which are applied to control quality of outcomes. Planning conditions are determined on a case-by-case basis. The obscuring of lower panes is often sought for two reasons – the privacy of users and visual amenity (screening building contents from view). The guidance aligns with legible streets. The example at para 1.68 refers to both property names and

				numbers. Para 2.40 provides further guidance on the display of property names and numbers.
R15	13	Please add condition on external accessible letter boxes – some communication has to be non-digital	N	Conditions are determined on a case-by-case basis. Para 2.40 provides guidance on letter boxes.
R15	14	Para 1.70 What activities is an “excellent” modern home designed for? How much space for cooking, storing food. What about clean work space, dirty work space, hobby space? What cultural life styles are homes designed for? Multi generational families? Which developers can afford excellence?	N	Space standards are set in the London Plan. These identify different areas for different uses. There is no need to duplicate its content here.
R15	16	Para 1.71 Is Lambeth offering Sustainability Specialists or requiring them (needs a verb) ?	Y	Accepted. Error corrected
R15	15	How long should a new building be expected to last? What about carbon costs in demolition? Are we looking for a balance between new build & refurbishment	N	Sustainability matters are addressed in: <ul style="list-style-type: none"> • Part 1 – Understanding Lambeth (sets out the sustainability policy framework) • Part 2 – Design Advice for All Development (includes guidance on biodiversity and urban greening) • Part 3 – New Buildings (includes guidance on sustainability, circular economy, whole life-cycle approach, energy hierarchy, renewable energy) • Part 4 – Building Extensions, Alterations and Retrofit (includes guidance on retrofit and climate change) • Part 5 – Basements (includes guidance on sustainable design and construction)
R13 Optivo	5	- Page 35 – paragraph 1.69 – for clarity and compliance with Government guidance, it may be beneficial to specify that: o where possible, Lambeth will avoid imposing conditions requiring the submission of details prior to works commencing, and	Y	Accepted. We have added para <u><i>1.76 where possible, Lambeth will avoid imposing conditions requiring the submission of details prior to</i></u>

		<p>o Lambeth will seek agreement from applicants before imposing conditions that require details prior to works commencing. This will ensure compliance with guidance at paragraphs 007 (Reference ID: 21a- 007-20180615) and 036 (Reference ID: 21a-036-20180615) of the Planning Practice Guidance.</p>		<p><u>works commencing, and will seek agreement from applicants before imposing conditions that require details prior to works commencing.</u></p>
	1	<p>Who is it written for as there is a lot of terminology that, as a resident, I don't automatically understand eg defensible outdoor space. Similarly the use of acronyms – the intro to the intro documents starts with SPD – with no explanation of what that is, or what the letters stand for.</p> <p>It might be that you feel the people using this document will get all this terminology – in which case I'll leave with your judgement!</p>	Y	<p>Part accepted. We have amended para 1.1</p> <p><u>1.1 Supplementary planning documents (SPDs) provide guidance on policies in an adopted local plan. They cannot introduce new planning policies into the development plan however are a material consideration in decision-making.</u> This SPD provides guidance on the implementation of policies in the Lambeth Local Plan.</p>
R52	2	<p>Child Friendly Lambeth – it gets a good mention in one of the documents but would it be worth including as part of the one of the overarching strategic priorities of the Council that then influences planning decisions.</p> <p>In terms of a design suggestion – rather than going through the whole set of documents and repeating child Lambeth statements, could you simply incorporate the images of the priority badges next to those pieces of guidance which you feel are helping to deliver those priorities. That way CFL could feel more embedded across the whole process and keep it in the mind of residents/architects/designers etc.</p>	Y	<p>Accepted. Throughout the SPD images of the priority badges are next to guidance which is particularly relevant to delivering those priorities.</p>

PART 2 – DESIGN ADVICE FOR ALL DEVELOPMENT

Response no.	Comment no	Comment	Y or N ?	Edit
R21 Historic England	2	Part 2: This section provides a set of overarching principles that are to be relevant to all types of development covered by the SPD. While heritage does feature within some of the individual principles, e.g. Principle 2.43 Outdoor Space requires designers to reuse historic paving and street furniture, there is no standalone principle regarding heritage and its conservation. We recommend that one is included, alternatively it could be made clear that the historic environment is a central theme running through all the principles.	N	<p>Part accepted.</p> <p>The guidance is clear that it is a suite of documents that should be read together. We have added additional text to part 1 to stress this</p> <p><i>Heritage Assets</i> <i>1.58 Lambeth has a particularly rich historic built environment which is multi-layered and a forms a significant part of Lambeth’s local distinctiveness. Collectively the Local Plan policies seek to preserve the significance of these heritage assets and protect their settings. <u>Designers should be mindful of the sensitivity of the historic environment when preparing schemes in accordance with the guidance in all parts of this Design Guide.</u></i></p>
R24 Brixton Society	5	<p>Sustainability in Construction and Use</p> <p>We are disappointed that this does not appear as the first item in this section.</p> <p>It should by now be recognised as a major design consideration in both new buildings and the alterations of existing buildings.</p> <p>In environmental terms, the “greenest” building is the one that already exists.</p>	N	<p>Noted. It is considered that that guidance contained within parts 3 and 4 adequately cover these matters.</p>

		<p>The embodied energy in existing structures should be taken into account at the outset before considering demolition – adaptation and re-use are preferable to new construction, minimising the generation of carbon dioxide during construction and in use.</p> <p>Therefore, owners and designers should be encouraged to consider at the outset whether an entirely new building is necessary, or whether existing structures can be re-used in whole or part.</p> <p>The building form should then be investigated for its environmental and sustainability implications, before the design becomes fixed, rather than attempt to “greenwash” the design as an afterthought.</p> <p>Beyond a general statement of principles, it will be acceptable for detailed matters to be covered under specific sections 3, 4 and 5.</p>		
R35	1	<p>Why does Lambeth council not make life easier for the public from road marking to road works, to parking issues, parking fines and to identify issued areas and support the public and support those you are supposed to serve, everything should be designed with the public and how it will affect their lives through financial hardships during these times ahead . Work with the public and not against them.</p>	N	Noted. This is not a matter for a design guide SPD.
R37	1	<p>The document is comprehensive and provides good and useful advice.</p> <p>There are a few typos:</p> <p>Page 4, 2.6 'accessible'</p> <p>Page 14, 2.36 'uniterupetd'</p> <p>Page 21, 2.47 'baysClearly'</p> <p>Page 23, 2.50 'com-mercial'</p> <p>Page 24, 2.54 'publically'</p> <p>Page 26, 2.57 'practical.Be'</p>	Y	Accepted. We have corrected typographical errors.

		<p>Page 28, 2.59 'publically'</p> <p>Page 30, 2.63.2 'practical.Be'</p> <p>Page 33, 2.70 'practical.Be' + 'Soothwark'</p> <p>Page 39, 2.87 'Draignage'</p> <p>Page 41, 2.96 'lumieres'</p> <p>Page 42, header 'Premeses'</p>		
Inclusive Environments				
R33 Waterloo Communit y Developm ent Group	5	In addressing these issues, designers should consider all sensory aspects, not merely the visual: for example, the tactile experience through the feet, and the soundscape experience created by buildings and materials.	Y	<p>The following text has been added to the end of para 2.1</p> <p><i><u>'In addressing these issues, designers should consider all sensory aspects such as the tactile experience through the feet, and the soundscape experience created by buildings and materials.'</u></i></p>
R15	17	<p>Part 2 Design advice for all Development</p> <p>Inclusive Environments (para 2.10)</p> <p>Much more detail needs to be provided to developers on designing for inclusion. Why are wheel chair homes not allocated early so the fit out can be tailored to the family's specific needs? Not all wheel chair homes should be 1-bed flats.</p>	N	See response to R15 2

R15	18	Please include the inclusion guide para 2.4 above.	Y	Accepted. We have moved weblink to inclusive environments above knee high report
R15	19	The Knee High Report is fascinating but is mainly about services rather than design.	Y	Noted. We have added additional link to GLA report Child Friendly London in the Child Friendly Lambeth section. https://www.london.gov.uk/sites/default/files/ggbd_making_london_child-friendly.pdf
R51	1	Should be re-worded as per below. 2.3 Designers should ensure: 1. Desire lines to public transport are anticipated in the design. 2. Blue Badge parking spaces and <u>Setting down points <i>and designated accessible car and cycle parking spaces should be located adjacent, or as close as possible, to the entrance to the facility they serve, and no more than 50 metres away.</i></u> Source: DfT - Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure. Include link	Y	Accepted. Amendments as proposed made to 2.3. Link added to Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure
R15	20	Active Environments. Para 2.7 In blocks where are the mobility scooters to be parked and charged(bullet 1) ?	N	There is no policy requirement for the provision of parking spaces for mobility scooters.
R15	21	Do space standards for new homes include space for indoor personal exercise -not everyone wants to go to a block gym (bullet 4). What about space for entertaining at home (bullet 4) ?	N	Space standards for new homes do not include requirements for exercise or entertaining.

R15	22	High quality streets must cater for a full range of abilities-“broader variety” (bullet 6) . Can we have guidance on play grounds above the ground – are they caged? Where is Lambeth’s much delayed Streetscape manual which was last due to be published in 2018. Is activity promotion a planning design issue (bullet 10) ?	N	Changing the content of para 2.8 is not considered appropriate as it has been written by Sport England.
R17 Guys and St. Thomas	1	We note that the Revised Draft Design Guide SPD seeks to encourage active environments and walkable communities throughout the report. The Trust is supportive of how the SPD encourages active environments and walkable communities. A significant emphasis is placed on maximising space dedicated to walking and cycling whilst designing out opportunist parking and vehicular movements. It is essential that active environments and walkable communities are created at the design stage, to encourage more healthy communities. We therefore encourage that more commitment is placed on providing active environments with greater spaces for walking and cycling.	N	Noted
Amenity				
R15	23	Amenity para 2.9 Meaning of beneficial places is culturally determined. How should developers approach the amenity question in such a diverse place as Lambeth?	N	No change. In the absence of any national or London wide guidance on this matter developers should continue to use established best practice.
R13 Optivo	6	Part 2 - Page 9 – image entitled “Inadequate screening” – the cross is in green rather than red.	Y	Accepted. We have changed the cross to red.
R15	24	Privacy para 2.12 The balance between safety on the streets from overlooked streets vs privacy needs to be drawn out . And the cultural/gender meanings of privacy. Are we retaining the 1m fence/hedge rule on boundaries facing the street to retain overlooking ?	N	Policy Q15 seeks to ensure street facing boundaries do not generally exceed 1.2m in height.

R13 Optivo	7	- Page 10 – paragraph 2.14 – references are made to glazing and balcony screening. An additional reference to boundary treatments may be helpful, as there will be occasions where boundary fences or planting are required to protect privacy. This section could also be cross-referenced to the guidance on page 52.	Y	Accepted reference to boundary treatments and cross reference to further guidance which is now on Page 59 Para 2.16: <i><u>'3. Boundary treatments and or planting in garden's (see pg59 for guidance)</u></i>
R33 Waterloo Community Development Group	4	Particular advice is required regarding taller and tall buildings, which can give perceptions of overlooking on open space far beyond their immediate location, whether in residential or commercial use. The careful angling of buildings (avoiding square-on frontage onto open space) windows and balconies are particularly important (a good example of balconies is on Riverside Court; a bad example are the proposals for Denby Court).	N	Noted.
R15	25	Outlook para 2.16 Does this imply no changes to location types, eg from suburban to urban, without a clear policy decisions – rather than by individual planning application? Daylight and sunlight (para 2.20) Summer 2022 reminds us of the importance of shade. Should we encourage colonnaded streets and avoid winter gardens?	N N	Matters of outlook are context specific and require a bespoke approach on a case by case basis. The guidance gives designers advice on what they need to consider. Design for shade is already covered elsewhere in the guidance (PARAS 2.45, 2.47, 2.48, 2.55, 2.59, 2.60, 2.68)
R13 Optivo	8	- Page 11 – paragraph 2.18 – the paragraph discusses angled windows and states that they are not appropriate in kitchens. Whilst we agree that this may not be appropriate in large kitchens or those combined with living areas, there may be occasions where angled windows are appropriate in smaller separate kitchens e.g. where living and kitchen areas are separate from one another.	N	Para 2.20 specifically states principal windows in kitchens are not appropriate and accepts that angled windows may be appropriate for secondary windows.

R26 CSCB	4	<p>Paragraph 2.21 states: <i>'When assessing applications the Council will have regard to Building Research Establishment (BRE) Guidance Note 209 – 'Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice. Applicants should be aware of its content.'</i></p> <p>Please see the point above under paragraph 1.12. Reference to the updated guidance needs to be made.</p>	Y	Accepted. The sunlight / daylight section (Para 2.21 – 2.28) has been refreshed to reflect the latest BRE guidance.
R13 Optivo	9	<p>- Page 12 – paragraph 2.22 – the paragraph states that the 45 degree and 25 degree rules will be applied and advises applicants to undertake their own assessments.</p> <p>Some illustrations would be beneficial showing how to apply these rules. Illustrations are likely to be particularly beneficial for householder applicants who are unlikely to have access to the Building Research Establishment (BRE) guidance. The guidance from Hart District Council at Appendix A, provides an example of the type of illustrations that may be useful.</p>	Y	<p>The sunlight / daylight section (Para 2.22 – 2.29) has been refreshed to reflect the latest BRE guidance.</p> <p>Illustrations have been added to illustrate 25 and 45 degree rules.</p>
R53 Ward Member	16	<p>2.23 This is strongly contested. The claim that “the BRE target criteria is based on a suburban location” has been denied by the BRE themselves, by the Secretary of State in his decision on 8 Albert Embankment, and by the High Court, in the Rainbird case. This is used to justify ‘Alternative Target Criteria’ i.e. lower standards of daylight because “it reflects the predominantly urban context in Lambeth”. This contradicts the judgement with regard to the definition of tall buildings that south of the South Circular is generally suburban. Furthermore, the BRE guidance allows the use of ‘alternative targets’ on specific grounds (such as development in a historic city centre or within a cluster of tall buildings). It does not propose alternative targets for urban areas because its standards apply to all areas – like adequate clean air, the amount of daylight required for mental and physical health – i.e. adequate daylight - is the same for residents in a country house or an urban flat. The proposal that the assessment of daylight should depart from BRE guidance in maintaining “a focus on retained levels rather than on the</p>	Y	Accepted. The sunlight / daylight section (Para 2.22 – 2.29) has been refreshed to reflect the latest BRE guidance and no longer refers to Alternative Target Criteria based on a suburban location.

		scale of reductions” is not justified. The BRE test consists of two interlocking measures, the proportion of loss (anything over 20% is problematic) as well as the amount of light retained (anything under 27% VSC is problematic). Why is the assessment of the proportion of loss being diminished? Again, the Rainbird High Court judgement established the two-stage assessment as the correct approach.		
R26 CSCB	5	<p>Paragraph 2.24 goes on to state: <i>‘Whilst daylight and sunlight levels will be considered flexibly taking into account site-specific circumstances designers will be expected to minimize adverse impacts. Careful siting and massing of new development is paramount to ensure adequate daylight and sunlight is retained to adjoining development.’</i></p> <p>In this regard, it is important to note that the Inspector considering the appeal proposals at 8 Albert Embankment concluded that <i>‘Although it is close to the heart of London, some of the affected accommodation around the appeal site houses families with vulnerabilities, who have little choice about where they live. Evidence that links daylight levels with human health, including mental health and disease resistance was referred to by LV, and is more than anecdotal... Material reductions in daylight should not be set aside lightly.’</i> Accordingly, the tenure of the effected housing is important too and so as well as referring to site specifics, the SPD should also refer to the nature and tenure of affected buildings as being important considerations.</p>	Y	Accepted. The sunlight / daylight section (Para 2.22 – 2.29) has been refreshed to reflect the latest BRE guidance.
R28	1	I have a number of concerns about the various parts of the document but my main concern is about the proposed change to adopt a flexible approach to the BRE guidance on access to, or loss of, light/sunlight (sections 2.23 and 2.24 of Document 2). It is widely acknowledged that light is important for our physical and mental health, and never more so than now when more of us are working from home, and mental health is higher on the public agenda than it has ever been. I would urge you to re-think the idea of lowering standards with regard to light.	Y	See R26 Comment 5

R27	1	<p>I have just been made aware of the above document, which I have read with interest. I understand that today is the final day for comments, and these are mine:</p> <p>I am particularly concerned that Lambeth is proposing to put its residents at a disadvantage compared with others in the country with regard to the potential negative impact of new developments on the amenity of light/sunlight to existing properties by adopting a ‘flexible’ approach to existing BRE guidelines. Light is important to our health and mental well being, and any changes for the worse will be sorely felt. Also, as I understand it, the BRE guidance is national, and does not differentiate between urban and suburban areas. I therefore feel quite strongly about the proposals in paragraphs 2.23 and 2.24 of the document “<i>Part 2 – Design Advice for All Development</i>” and would urge Lambeth to treat its residents equably.</p> <p>I am also concerned about the move suggested in the document towards making areas of Lambeth even more densely populated than they already are. Studies show that crowding people together has a negative impact on well-being and can lead to more aggressive and anti-social behaviour. We already see the effects of people suffering from this everyday – as reflected on social media sites and apps such as Nextdoor.</p> <p>I would therefore urge Lambeth to amend these sections of the document so that access to light/sunlight is not treated as a dispensable amenity, but rather is given the level of importance it deserves.</p>	Y	Accepted. The sunlight / daylight section (Para 2.22 – 2.29) has been refreshed to reflect the latest BRE guidance and no longer refers to Alternative Target Criteria based on a suburban location.
R29	1	<p>My neighbours and I have today been made aware of the contents of The Revised Draft Lambeth Design Guide SPD about which I have some comments I would like to share with you.</p> <p>My main concern is the proposed flexible approach to the existing BRE guidelines in relation to the accessibility to sunlight/daylight on the</p>	Y	See R27 Comment 1

	<p>existing properties of the borough. I'm not sure why this would be different for the residents of Lambeth to those of the rest of the country? With the amount of development, particularly of high-rise imposing buildings shooting up all around this area, we surely need to be preserving and protecting access to light particularly for those buildings which have been here a long time and are the fabric of our history and community. Many of these building are now being dwarfed by the new developments and are being literally left in the shadows which is not healthy for either the properties or the people who live in them.</p> <p>Having direct sunlight and daylight has an immediate effect on wellbeing and is vitally important for mental well-being. The BRE guidance is for <u>national coverage in both suburban and urban areas</u> as I understand it, so I'm unclear and extremely concerned that Lambeth would be adopting a different policy.</p> <p>May I highlight the proposals in paragraphs 2.23 and 2.24 of the document "Part 2 – Design Advice for All Development" for your attention and ask that you reconsider this so that all residents are treated the same.</p> <p>Another alarming concern is the proposal to make Lambeth even more densely populated than it currently is. This is a very busy area with great strain on the roads and public transport as well as local services. Over populating urban areas has been shown to have a negative impact on those living there.</p> <p>Lambeth is a richly populated area with an amazing mixture of historic and modern buildings and a diverse population. I would therefore ask Lambeth to amend the relevant sections of the document to preserve our access to light/sunlight to ensure this remains a healthy and happy place to live.</p>	
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R22 KMK Architects	1	<p>In Lambeth's Design Guide Part 2 "Design Advice for all development" Clause 2.23 states that Lambeth's Alternative Target Criteria "...reflects the predominantly urban context in Lambeth..." and "...BRE target criteria is based on a suburban location...". Clause 2.24 also includes "...daylight and sunlight levels will be considered flexibly taking into account site-specific circumstances ..."</p> <p>During our entire working relationship with the BRE, including consultations and commissioning assessments of Daylighting and Sunlighting Reports, it is clear that the above statements are incorrect. Indeed Dr. Paul Littlefair, the author of the BRE Guidelines has made this clear in his response to legal queries from the community, the the BRE guidelines are NOT based on on low density suburban housing models, but on national and international recommendations for daylight and sunlight provision. Alternative target values are referred to only where new developments match the heights of existing buildings, and gives examples of a historic city centre or an area with existing high rise buildings.</p> <p>The Draft Guidance as it stands, allows a moveable and open-ended approach that makes a mockery of the actual content and intentions of the BRE Guidelines.</p> <p>It is an attitude that risks Lambeth Council encouraging and upholding the worst aspects of Victorian standards of living. Any new development that breaches the current BRE Guidelines, would be in conflict with Lambeth Council's stated aims of boosting the welfare of its communities- with the resulting impacts on mental health and sense of well-being, and meeting its zero-carbon targets, where residents and workers would need to rely on artificial lighting for most of the day.</p> <p>We strongly urge that the new Guidance relies on the BRE Guidelines as written, with allowances beyond these target only in aspects as clearly</p>	Y See R27 Comment 1
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		defined within the Guidelines, and that Lambeth Council relies on the explanations of the authors of the BRE Guidelines for any further interpretations	
R30	1	<p>WHY DID YOU NOT CIRCULATE THE NEW “DESIGN GUIDE” TO EVERYONE LOCALLY AFFECTED, SINCE YOU KNOW WE ARE INTERESTED PARTIES?</p> <p>About three hours ago I was informed by a neighbour I met in the street that this Revised Design Guide exists and includes written confirmation of Lambeth Planning's prejudice in favour of development at any cost, as evidenced by its arrogant, specious and inaccurate dismissal of BRE guidelines on Rights to Light. In order to make my feelings clear I have to submit my comment before midnight tonight. Why are you trying to bury the facts?</p> <p>My house is directly affected by a proposed development (of The Settlement). Were you to get your way by claiming that the BRE's expert opinion is valueless, the development could well go ahead and my bedrooms and living room and hall on three storeys would be in shadow most of the time. I am among many of people in Harleyford Road and Vauxhall Grove who object on similar grounds. You know who we are; you have seen our written objections to NHG's proposals and our interest in receiving information from you.</p> <p>WHY DID YOU NOT CIRCULATE THE NEW “DESIGN GUIDE” TO ALL OF US WHO ARE INTERESTED PARTIES?</p>	<p>Y</p> <p>The public consultation approach followed that outlined in the Council's Statement of Community Involvement 2015 and the revised Statement of Community Involvement 2020.</p> <p>The public consultation ran from 08 July 2022 to 02 September 2022. The public consultation period was extended from a 4 week statutory length to 8 weeks to account for the summer break.</p> <p>Accepted. The sunlight / daylight section (Para 2.22 – 2.29) has been refreshed to reflect the latest BRE guidance.</p> <p>It would be inappropriate here to comment on the planning proposals for the St. Anne's Settlement Harleyford Road which is a live application.</p>

		At a wild guess, I'd say you'd rather sneak through a sloppy and mundane development on the Settlement site than make a real effort to improve the conservation area by insisting on a well designed building with a smaller footprint and lower height that didn't ruin the existing streetscape.		
R31	1	<p>We would like to raise our concerns about the draft Lambeth Design SPD document in relation to the section on daylight and sunlight on page 12 of Part 2.</p> <p>Paragraphs 2.23 and 2.24 state that (emphasis added):</p> <p><i>2.23 In addition to its standard assessment having regard to the BRE guidance, the Council may apply Alternative Target Criteria to ensure that appropriate levels of daylight and sunlight are retained at minimum levels. This assessment provides an additional understanding of the impact of new development on surrounding residential properties with a focus on retained levels rather than on the scale of reductions. It reflects the predominantly urban context in Lambeth where new development will inevitably have an impact on surrounding properties in some locations, as well as reflecting the fact that the BRE target criteria is based on a suburban location. 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.</i></p> <p><i>2.24 Whilst daylight and sunlight levels will be considered flexibly taking into account site-specific circumstances designers will be expected to minimize adverse impacts. Careful siting and massing of new development is paramount to ensure adequate daylight and sunlight is retained to adjoining development.</i></p> <p>We would like to point out that this contains a factual inaccuracy- the BRE target criteria are <u>not</u> based on a (low density) suburban location. They are based instead on national and international recommendations</p>	Y	See R26 Comment 5 & R27 Comment 1

		<p>for daylight and sunlight provision. This has been confirmed publicly by Dr Paul Littlefair, the author of the BRE publication. Quite clearly what defines an adequate retained level of daylight or sunlight does not depend on where you live- a gloomy room is a gloomy room wherever it is situated.</p> <p>This error needs to be corrected and in addition the associated disturbing inference that Lambeth residents living in a more urban setting should not be considered to need the same level of daylight and sunlight amenity as those residents elsewhere in the borough. Or indeed that Lambeth residents as a whole should not be considered to need the same level of daylight and sunlight amenity as residents living outside the borough because of its predominant urban context.</p> <p>It follows that this misleading interpretation of BRE guidance with respect to urban versus suburban contexts should not be taken into account when 'flexibly' considering site -specific circumstances referred to in paragraph 2.24.</p>	
R32	1	<p>In addition to my comments regarding your attempts to deprive me and my neighbours of my right to light, a right enjoyed by the dwellers of those properties since time immemorial, in favour of modern , dense, living environments, contrary to the conservation areas etc. And all for what? So that we may have additional to the 30,000 unaffordable flats,more flats?</p> <p>I am also totally disgusted that you did not see fit to make people aware of your new thinking regarding the area; was this influenced by the desires of Notting hill housing association? In which case...send them back to destroy Notting hill, not my beautiful Lambeth! We don't need more developments like this here.</p>	<p>Y See R27 Comment 1</p> <p>It would be inappropriate here to comment on the planning proposals for the St. Anne's Settlement Harleyford Road which is a live application.</p>

		<p>How often will this council continue to cow tow to the whims of the carpet baggers? Trump type developers who view Lambeth as a shit hole! Well, as long as you keep making it easier for these types of developments, Lambeth will become the shit hole that trump believes it to be.</p> <p>Take somepride in the borough and stop making it easier for the carpet baggers to ride roughshod over the history, the people and the essence of Lambeth.</p>		
R33 Waterloo Communit y Developm ent Group	1b	<p>We have some comments and proposed amendments below, but we also have a very strong objection to the section regarding Daylight and Sunlight</p> <p>On this matter, this draft SPD goes well beyond the scope of the Local Plan, which states at 10.5 The council will use established industry standards when assessing schemes, including Site Layout Planning for Daylight and Sunlight (BRE).</p> <p>In fact, the draft SPD attempts a devastating assault on the mental health and well-being of residents by slashing standards for access to daylight and sky under the guise of guidance to the Local Plan, in the teeth of policy and recent decisions in Lambeth by the Secretary of State.</p> <p>The approach proposed on daylight in part 2 of the draft SPD is completely unacceptable. Firstly, it refers to a version of the BRE guidance which was updated and superseded earlier in 2022, and refers to tests which are no longer part of the BRE guidance (Average Daylight Factor and No Sky Line/ Daylight Distribution)</p> <p>Secondly, the section on daylight in the draft SPD is founded on a deliberate misconstruction of the BRE guidance as being based on a suburban location. This is entirely untrue, as was established at the Albert Embankment inquiry in evidence provided by the author of the BRE guidance, Dr Paul Littlefair: the guidance is based on national and</p>	Y	See R27 Comment 1

		<p>international recommendations on daylight and sunlight provision and not on any particular building context. This was confirmed again in an email (see Appx 1).</p> <p>Lambeth Planning Design team and their daylight advisers Schroeders Begg were active participants in the inquiry and are well aware of the Secretary of State’s decision and the Inspectors conclusion: Suggestions that higher daylight levels are more applicable in suburbs and that poorer conditions may be considered acceptable in dense inner-city areas should be treated with great caution. (837)</p> <p>The deliberate and persistent inclusion of this calumny about the BRE guidance can be at best interpreted as a pernicious and despicable obfuscation.</p> <p>This draft SPD then uses this false premise to propose effectively abandoning the protections for the amenity of existing residents provided in the BRE guidance. To be clear, the BRE guidance</p> <ul style="list-style-type: none">• establishes that with “at least 27% VSC conventional window design will usually give reasonable results”, but that with “between 15% and 27% VSC special measures [such as enlarging existing windows in the affected neighbouring property] are usually needed to provide adequate daylight”, and that “between 5% and 15% “it is very difficult to provide adequate daylight”• The BRE’s 27% VSC is neither a target nor a minimum level, but simply the arrangement of window and sky which would generally provide adequate daylight in homes• In order to not prevent development which has only a marginal effect on daylight to existing dwellings, the BRE guidance also proposes a 20% loss threshold: losses less than this may be not so noticeable, but “if the VSC, with the new development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the	
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	<p>reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy and electric lighting will be needed more of the time”.</p> <p>In other words, both interlocking criteria – absolute levels of VSC and relative quantities of loss –need to come into play in determining whether a proposal results in an acceptable or unacceptable impact on levels of daylight, which is the requirement of Policy Q2 (iv).</p> <p>But Lambeth’s draft SPD proposes to do away completely with one arm of this this test, and shrivel the other arm into a withered stump. It allows the Council (and therein applicants) both to apply “Alternative Target Criteria” and then to “focus on retained levels rather than on the scale of reductions”.</p> <p>The BRE guidance allows alternative targets, but only in special circumstances where existing built form is already challenging, such as in historic city centre (such as the Shambles in York), or an area with modern high rise buildings (such as at the centre of the City cluster). Unfortunately, Schroeder’s Begg have not always understood this point: in the Albert Embankment inquiry they proposed Eustace House (Old Paradise St) and the Graphite Square Appeal as examples where alternative target criteria were adopted; in fact neither was the case, and there is no mention of alternative targets in the Graphite Sq Inspector’s report. As the Inspector for 8 Albert Embankment summarised “In my view, there is a danger in placing too much reliance on such comparisons. Although it is close to the heart of London, some of the affected accommodation around the appeal site houses families with vulnerabilities, who have little choice about where they live. Evidence that links daylight levels with human health, including mental health and disease resistance was referred to by Lambeth Village, and is more than anecdotal. <i>Material reductions in daylight should not be set aside lightly.</i>” (757)</p>	
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		<p>the studies to show the impact of 15% VSC on residential amenity and physical and mental health?</p> <p>The draft SPD provides no evidence to counter the Secretary of State’s Inspector, just as Lambeth’s retained daylight expert has consistently failed to justify such targets – or are they minimums? On this, as much else, the draft SPD confusingly proposed alternatives as both targets and minimums.</p> <p>In conclusion, this draft guidance is unacceptable regarding daylight and Policy Q2:</p> <ul style="list-style-type: none"> • It is inconsistent with and misconstrues the BRE guidance • It proposes an alternative approach without any evidence • It is inconsistent with the recent decision by the Secretary of State at Albert Embankment • It is inconsistent with the London Plan and the draft guidance recently consulted on • It is confused and logically inconsistent <p>Finally, unlike many places elsewhere in this draft design SPD which seeks to support improvements to the well-being of Lambeth residents through the promotion of good design, when it comes to daylight the draft fails to explain why access to daylight matters in terms of mental health and well-being and needs to be protected whilst optimising the development of sites and increasing densities.</p>	
R33 Waterloo Community Development Group	2	<p>Large and tall developments can have a significant impact on sunlight in open space through overshadowing. This is acknowledged in passing in the draft SPD, but there is no clear guidance on it, particularly with regard to the horticultural requirements of maintaining green open space, or the different times open spaces are used. The draft guidance from the GLA (Housing Design Standards LPG) proposes to</p>	<p>Y Accepted we have added an additional bullet to para 2.29</p> <p><u><i>6. For sunlight provision to outside spaces for amenity, the BRE guidance and the Mayors Housing Design Standards LPG should be referred to.</i></u></p>

		<p>“Maximise the quality and availability of daylight and sunlight in communal outside spaces, particularly in winter. It is particularly important that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used.” (B9.5 re Policy D6)</p> <p>This approach needs to be taken to assessing the impacts of proposed development on existing public open space, especially green open space, where the minimum 2 hours for 50% of the time proposed in the BRE guidance is inadequate, as the campaign run by the Garden Museum has attested.</p>		
R34 Lambeth Village	1	<p>2.23 ‘the fact that the BRE target criteria is based on a suburban location.’</p> <p>This is factually incorrect; the BRE has stated very clearly in reports received by Lambeth and statements to public inquiries attended by Lambeth such as that on 8 Albert Embankment in December 2020, that their benchmarks are not suburban. In fact it is not based on any particular context.</p> <p>The BRE states that benchmarks are based on national and international standards of the requirements of daylight in property to be inhabited by human beings.</p> <p>Humans do not vary by context, they are the same whether they live in urban or suburban contexts.</p> <p>As with space standards there has to be a precise amount of daylight that a human being will receive in their habitat. The most accepted definitions are those of the BRE.</p>	Y	R27 Comment 1

		<p>2.24 'Whilst daylight and sunlight levels will be considered flexibly taking into account site-specific circumstances designers will be expected to minimize adverse impacts.'</p> <p>This again suggests that the daylight requirement can vary by context, when human beings need a standard of daylight provision irrespective of context.</p> <p>This is fundamentally incorrect and will lead to blighted and sub-standard housing being created. It will almost certainly affect the most disadvantaged who rely on the planning system for protection from over developments.</p>		
R42	1	<p>2.12 Care must be taken for existing residents when considering privacy and overlooking, not just the potential residents of new buildings.</p> <p>2.20-24 BRE guidelines should be followed as standard practise and the council should assume developer's tests are inaccurate and biased so should commission it's own tests as standard practise. Lower baselines should not be acceptable; this will lead to existing residents suffering because of new development.</p>	Y	R27 Comment 1
R43	1	<p>The Garden Museum is concerned that the Design Guide does not make any reference to sunlight or overshadowing. Nor do they make reference to the national guidelines (BRE Guidelines) for sunlight in open spaces.</p>	Y	See R33 comment 2
R44	1	<p>In 2.23 your document states: 'as well as reflecting the fact that the BRE target criteria is based on a suburban location'.</p> <p>As you are aware any new build, especially if higher than the existing surrounding and/or adjacent dwellings will obviously have a detrimental impact on residents daylight levels.</p> <p>You state that BRE levels are based on a suburban location but my understanding is that BRE levels are based on national and international recommendations which is a completely different scenario to that of suburban housing.</p>	Y	R27 Comment 1

		I believe this statement needs to be clarified as any loss of daylight to existing homes because of a new development has a major impact on the lives and well being of those affected directly.		
R45	2	<p>Comments on Lambeth SPD Part 2 Design Advice for All Development Daylight and Sunlight</p> <p>Paragraph Lambeth SPD Part 2 2.21 states: When assessing applications the Council will have regard to Building Research Establishment (BRE) Guidance Note 209 'Site Layout Planning for Daylight and Sunlight " A Guide to Good Practice. Applicants should be aware of its content.</p> <p>Having awareness of the guidance note does not encourage or enforce compliance to adhere to it. This paragraph should be reworded please to ensure it has meaning and weight.</p> <p>With regards to Lambeth SPD Part 2 para 2.23, please note: 1)Paragraph 2.23 it is not clear as to what alternative target criteria will be applied to ensure that appropriate levels of daylight and sunlight levels are retained. 2)What actually are these so called 'minimum levels' There are significant equalities and human wellbeing issues that this approach will generate as it will permit humans in one site specific context to have to endure lower levels of daylight compared to other inhabitants who may reside in a less dense setting (even if they are in the same borough). Human beings are meant to be treated equally in the United Kingdom regardless of the setting of their location. 3)The focus on retained levels rather than scale of reductions is also contrary to the BRE guidelines which state that any reduction beyond 20% is likely to be noticeable to inhabitants. 4)Contrary to paragraph 2.23, BRE target criteria are not based on a suburban location. The BRE target criteria are based on national and international recommendations for daylight and sunlight provision. BRE</p>	Y	See R27 Comment 1

		<p>guidelines do not exclude themselves from being applied based in an urban or suburban context such as Lambeth or any other contextual form.</p> <p>5)It is not clear what ‘mirror assessments’ are being referred to and what makes a robust case for their acceptability as a suitable methodology for assessing daylight and sunlight impacts of a development and in what some circumstances would meaningfully allow its application.</p> <p>The allowances proposed in paragraph 2.23 are completely contradictory to paragraph 2.24 which should have primary consideration in this specific matter:</p> <p>Whilst daylight and sunlight levels will be considered flexibly taking into account site-specific circumstances designers will be expected to minimize adverse impacts. Careful siting and massing of new development is paramount to ensure adequate daylight and sunlight is retained to adjoining development</p>		
R46	1	<p>I object to the idea in para 2.20 - 2.24 that the existing light of neighbouring dwellings could be reduced to a minimum standard rather than the council supporting and enforcing the right to light which currently exist. Additional buildings causing a light impact may/will change the circulation and flow of air which may be in turn severely reduced. This airflow in many areas of Lambeth is essential in aiding the removal of traffic fumes and pollution!</p>	Y	See R27 Comment 1
R47	1	<p>BRE guidelines should be upheld for existing buildings and amenities impacted by a proposed new developments as well as being fully adhered to when designing any new development. BRE guidelines must not be compromised by developers in their attempts to create as many units as possible with in a site to make higher returns in their investment. The quality of life for existing neighbours and new residents is of prime importance. Green spaces allowing bio-diversity, privacy, adequate sunlight and shade and outside space etc etc are all important in creating a thriving community and pride in one neighbourhood. New developments should sit comfortably alongside existing homes and not</p>	Y	See R27 Comment 1 and R33 Comment 2

		have negative impacts on existing residents. They should improve the neighbourhood not create discord or resentment.		
R49	2	<p>2.23 the fact that the BRE target criteria is based on a suburban location.</p> <p>This is factually incorrect; the BRE has stated very clearly in reports received by Lambeth and statements to public inquiries attended by Lambeth such as that on 8 Albert Embankment in December 2020, that their benchmarks are not suburban. In fact it is not based on any particular context.</p> <p>The BRE states that benchmarks are based on national and international standards of the requirements of daylight in property to be inhabited by human beings.</p> <p>Humans do not vary by context, they are the same whether they live in urban or suburban contexts.</p> <p>As with space standards there has to be a precise amount of daylight that a human being will receive in their habitat. The most accepted definitions are those of the BRE.</p> <p>2.24 'Whilst daylight and sunlight levels will be considered flexibly taking into account site-specific circumstances designers will be expected to minimize adverse impacts.'</p> <p>This again suggests that the daylight requirement can vary by context, when human beings need a standard of daylight provision irrespective of context.</p> <p>This is fundamentally incorrect and will lead to blighted and sub-standard housing being created. It will almost certainly affect the most disadvantaged who rely on the planning system for protection from over developments.</p>	Y	See R27 Comment 1

R53 Ward Member	4	Regarding the impact of development on sunlight on open space, Housing Design Standards LPG (08/06/23) states "Maximise the quality and availability of daylight and sunlight in communal outside spaces, particularly in winter. It is particularly important that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used." (B9.5) This is not reflected in Lambeth's draft guidance at 2.43 or 2.59, for example.	Y	Accepted. See R33 comment 2
R16 Port of London Authority	2	<p>Support reference to the Agent of Change principle in paragraph 2.28 under noise and vibration. However, to note the London Plan policy referenced here (D12) is on Fire Safety - this should be amended to policy D13 (Agent of Change). Reference should also be given to paragraph 187 of the National Planning Policy Framework (NPPF) which specifically refers to the Agent of Change Principle and the need to ensure that where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') is required to provide suitable mitigation. Linked with this the PLA support paragraph 2.29 which states that existing noise sources need to be taken into account and their adverse impact addressed at the outset of the design process. Here it should be made clear that the onus is on the applicant to address these impacts rather than the existing business/facility.</p> <p>With regard to lighting, referenced in paragraph 2.34 of the SPD, for riverside development it is important to ensure that any external lighting does not cause a potential hazard to the safe navigation of the river, or to river ecology. It is therefore recommended that these considerations are added to the second bullet point at paragraph 2.34 to ensure applicants take these matters into consideration where relevant.</p> <p>As part of the public realm section, the PLA consider it is essential for riverside developments, as part of public realm / landscaping proposals</p>	Y	<p>Accepted. We have amended text in Para 2.30 to reference correct policy. <i>'2.30.....A starting point for all designers should be policy <u>D1213</u> of the London Plan.</i></p> <p>Additional text added to Para 2.36 <i>4. <u>'For riverside development ensure that any external lighting does not cause a potential hazard to the safe navigation of the river, or to river ecology.'</u></i></p> <p>We have added new Para 2.46 <i>'2.46 <u>Public realm / landscaping proposals for riverside development should ensure appropriate riparian life saving equipment (such as life buoys, grab chains and</u></i></p>

		<p>to ensure that appropriate riparian life saving equipment (such as life buoys, grab chains and escape ladders) is provided. In 2020 the PLA published 'A safer riverside' guidance for development on and alongside the Tidal Thames (http://pla.co.uk/Safety/Water-Safety/Water-Safety) which includes design guidance on edge protection, lighting, and signage as well as detailed information on riparian life saving equipment and it is recommended that this guidance is considered for all development alongside or on the tidal Thames and should be specifically referred to in the SPD.</p> <p>On Urban Greening and Biodiversity, support the reference confirming that the tidal Thames is a priority habitat in the Lambeth Biodiversity Action Plan, with an associated action plan. As part of the Green infrastructure section in paragraphs 2.78 – 2.79, for riverside development specifically reference should be given in the SPD to the Thames Estuary Partnerships Estuary Edges guidance, (https://www.estuaryedges.co.uk/introduction/) which outlines a number of methods and principles which reverse the impacts of encroachment and/or soften banks in urban estuaries through reconstruction or refurbishment techniques to add value to the development potential of the site.</p>		<p><i>escape ladders) is provided. Guidance for development on and alongside the tidal Thames below:</i> http://pla.co.uk/Safety/Water-Safety/Water-Safety</p> <p>Reference added to Para 2.95 '<i>For riverside development the Thames Estuary Partnerships Estuary Edges guidance outlines a number of methods and principles which reverse the impacts of encroachment and/or soften banks in urban estuaries through reconstruction or refurbishment techniques to add value to the development potential of the site.</i> https://www.estuaryedges.co.uk/introduction/</p>
R25 GLA	16	Pg 13 Correct LP2021 Policy reference- Policy D12 refers to Fire Safety – The Noise and Vibration section of the guide should refer to Policy D13 Agent of Change.	Y	Accepted. See response to R16 2
R13 Optivo	10	- Page 13 – paragraph 2.30 – Point 2 – “away for” should be “away from”.	Y	Accepted. We have amended text at Para 2.32 point 2 to state: 2.' <i>Locate bedroom windows away for from busy communal entrances or late-night uses.</i>

R24 Brixton Society	6	<p>We welcome the guidance for residential development. However, considering the proliferation of proposals for café and takeaway uses, and latterly for “dark kitchens”, it seems a wasted opportunity that more guidance on good practice for commercial uses is not provided here.</p> <p>Compared with other sections of the SPD, insufficient guidance or signposting is provided on refuse and recycling storage for shops, cafes and other commercial uses.</p> <p>The SPD should include direct links to the relevant guidance on:</p> <ul style="list-style-type: none"> - Environmental standards for commercial extract ventilation; - Refuse storage (poor indexing makes this difficult to locate). 	N	Para. 2.33 refers directly to odour commercial kitchens with signpost to the councils refuse and recycling storage guidance
R13 Optivo	11	- Page 14 – paragraph 2.33 – the text is located across the footer at the bottom of the page. Some text may be missing.	Y	Accepted. No text is omitted but will revise layout to ensure footer at bottom of page
R04 City Planning	7	<p>Paragraph 2.36 – 2.37 of SPDP2 provides guidance on dual aspect. The guidance should include roof lights as a successful way of providing dual aspect in new flats that are contained in roofs, as they meet the amenity requirements set out in paragraph 2.37. They can act as an excellent way of controlling heat and ventilation due to the way they open. They can also provide good outlook and daylight levels, as well as dissipating pollution.</p> <p>LB Lambeth are seeking to achieve their housing and small sites targets through inter alia upward extensions and roof developments. Acknowledging roof lights provide a second aspect will facilitate a greater number of units being delivered through these types of developments.</p>	N	The SPD is guidance which has been prepared to support the implementation of the Lambeth Local Plan 2021. Policy H5 of the local plan stipulates that proposals provide dual-aspect accommodation, unless exceptional circumstances are demonstrated. The explanatory text at para 5.31 outlines the London Plan and associated guidance used to define requirements of policy H5. The Mayor’s Housing SPG defines dual aspect as those with ‘openable windows on two external walls’.

R15	26	Safety Para 2.39 Is the aim to eliminate render – a traditional part of much of the borough and examples included as good practice in the photos in this guide? Graffiti is sprayed on bricks -just more difficult to remove	N	Policy Q5 of the Local Plan resists the use of render. Rendered surfaces generally attract graffiti as they provide a blank canvas for that reason they are at greater risk to graffiti than brick surfaces.
R15	27	Entrances Para 2.40 Good design should include protection from heavy rain and hot sun.	N	Para 2.41 Bullet 2 already encourages the use of canopies for 'amenity' which includes shade and shelter.
R25 GLA	17	Pg 16 Amend language used on Image 2 description. Something softer than 'mean communal entrance'.	Y	Accepted. We have amended image 2 title on pg 19 'Unwelcoming and mean <u>undersized</u> communal residential entrance.
R13 Optivo	12	- Page 16 – paragraph 2.4.1 – the reference to "Health Streets" should be Healthy Streets".	Y	Accepted. We have amended text in para 2.44..... Link to <u>Healthy Streets Toolkit</u> below'
R13 Optivo	13	- Page 21 – paragraph 2.47 – the points listed are supported. A general point regarding disabled parking and delivery vehicle parking may be beneficial to ensure these are considered early in the design process.	Y	Accepted. We added additional points to Para 2.51 <u>'8. Ensure location of blue badge parking is considered early in the design process so that it is sited closest to setting down points or placed near entrances.'</u> <u>'9. Ensure where necessary that delivery vehicle parking is considered early in the design process.'</u>
R51	2	Para 2.47 add new points as below: <u>9. Publicly accessible space on private land should be integrated and compatible with the adjacent public realm.</u>	Y	Accepted. We have amended Para 2.48 as proposed.

		<u>10. Ensure public realm works are consistent with the council's agreed standard streetscape materials and street furniture. Material specifications should be durable, cost effective and easily sourced for repairs.</u>		
R15	28	Outdoor space (para 2.43) Can we have a section on way finding? Surely not everyone is expected to use a smart mobile phone so & obviate the need for pedestrian wayfinding signs?	N	Most development in Lambeth isn't large enough to need wayfinding. Therefore, detailed guidance on the matter is not considered necessary.
R15	29	Anything on outdoor wi-fi ?	N	There is no policy requirement to provide outdoor wifi and therefore advice on the matter is not considered necessary in this instance.
R15	30	Do disabled people want warning of obstacles and trip hazards? Especially on pedestrian only routes like Van Gogh Walk. Lots of hard edges are trips for playing children too.	N	Detailed standards relating to construction detailing is set out in the building regulations and highways advice from TfL. Such detail is not considered necessary in this document.
R15	31	Para 2.44 bullet 10 historic paving should possibly be listed as these granite kerbs & cobble were dug out of UK mountains & their sources are identifiable . But cobbles are terrible for limited mobility & push chairs.	N	Listing is not a matter for this document. Noted.
R15	32	Para 2.44 bullet 14. Where is the Lambeth Public Realm Design Guide	N	Lambeth uses TfL guidance for public realm.
R25 GLA	15	The public realm section should align more directly to the Mayors Public London Charter LPG, acknowledging the charter principles.	Y	Accepted. We have included link to the Mayors Public London Charter LPG after Para. 2.43
R17 Guys and St. Thomas	2	Access for all users Paragraph 2.44 of the Revised Draft Design Guide SPD outlines the approach to access and servicing. The Trust believes that greater emphasis is required to highlight the importance of developments that ensure access for all users, including disabled access. Access for disabled	N	Noted. This is a specialist area in its own right on which a raft of guidance has been prepared by other organisations. It is not the role of this guidance to duplicate that work. Part 1 of the SPD provides link Part M of the building

		<p>users must be available moving through the site as well as within especially if located near to healthcare uses. The Trust still believes that more could be done in the SPD to ensure that disabled access is always considered when looking at site layout and access generally. The SPD does not explore how design stages can actively encourage disabled access within the layout of developments.</p> <p>We therefore request that appropriate design provisions are implemented to ensure that access to buildings is provided for all users, especially disabled users.</p>		<p>regulations which sets out building regulations for access to and use of buildings, in dwellings and buildings other than dwellings and provides a baseline for accessibility in the built environment. Part 2 of the SPD provides links to further guidance on public realm such as: Accessible London: Achieving an Inclusive Environment Supplementary Planning Guidance (2014) and Expanding London's Public Realm Design Guide (2021)</p>
R15	33	<p>Bollards para2.45</p> <p>Stainless steel bollards, railings & cycle hoops should NOT be generally accepted. They are a fashion but almost invisible to people with visual impairment or not concentrating. Where absolutely essential they MUST have permanent hi- viz strip . Lambeth is unique – it does not have to follow the crowd. A unified approach to use of colour would be welcome at neighbourhood level, eg town centres or LTNs, can help with sense of place and way finding.</p>	N	<p>Contrast strips are generally standard on bollards.</p>
R15	34	<p>New public space para 2.46</p> <p>Edgeless spaces feel very open but what about safety of enclosure for those with children and dogs. How do you way find a route across Windrush Sq in a wheelchair?</p>	Y	<p>Accepted. Additional text added at end of para 2.50</p> <p><i><u>'Advice elsewhere in this section is also relevant here. Consideration should be given to enclosing some spaces where the safety of users (children in particular) is a particular sensitivity.'</u></i></p>
R15	35	<p>Parking para 2.47</p> <p>What is the target for EV charging? Please include mobility scooters Should hire bike parking be included here? Any guidance on disabled parking bays?</p>	N	<p>The Council defers to TfL guidance on these matters.</p>

R17 Guys and St. Thomas	3	<p>Provision of Emergency Vehicle Access</p> <p>We note that paragraph 2.47 of the SPD on surface parking relates to prioritising pedestrian comfort and residential amenity over convenience for motorists, and that paragraph 3.50 makes mention of a single access point to a site having challenges for the provision of emergency access. The Trust would encourage design requirements to be included in relation to ensuring that surface parking and delivery areas do not inhibit emergency service vehicles from accessing the site. More should also be done within the SPD to ensure that emergency vehicle access is always considered when dealing with site layout and access generally. We previously made representation that the Draft Design Guide SPD does not provide specific design guidance on this issue The Trust emphasises that it is essential that provisions for emergency vehicle access are implemented at the design stage in order for healthcare services to continue to operate optimally. We therefore request that appropriate design provisions and requirements are implemented to encourage that access for emergency vehicles is prioritised. The Trust is happy to answer queries or work with the Council on this.</p>		<p>It is a given that parking layouts and access details will comply with the necessary highways / transport regulations in terms of access, turning and emergency services access. However, given the importance of the topic a new bullet 1 has been added:</p> <p><u>4. Ensure layouts meet all the necessary regulations in terms of access and turning, especially in relation to emergency vehicles.</u></p>
R33 Waterloo Community Development Group	3	<p>Parking (2.4)</p> <p>Advice should be given on the provision and arrangement of the increasing number of parking bays used as electric charging points, where queues of cars waiting to charge are becoming a problem. This isn't merely a matter of provision.</p>	Y	<p>Para 2.51 has been amended</p> <p>'Where required include the provision of electric vehicle (EV) chargers. Where possible use solar powered EV chargers'</p>
R51	3	<p>The previous draft included this section in 2.51 (page 23), the latest includes it under 2.45 (page 17). It seemed more appropriate within the former.</p> <p>Additional paragraph needed - the title of this section is Parking and Vehicular Servicing but there's not much about servicing here.</p>	Y	<p>Accepted apart from location of section. This section was moved in because of consultation response from another respondent. We have added link to London Plan Chapter 6 and added para 2.52 as proposed.</p>

		<p>Addition proposed</p> <p>The London Plan Chapter 6 London's Transports sets out the maximum parking standards for different uses. See https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p><i><u>2.52 Policy T7 of the Lambeth Local Plan seeks to manage the impacts of servicing and freight, and requires all servicing should to take place off-street within the development site. In larger or mixed use schemes, facilities for receiving and storing personal deliveries should be accommodated within the development. For larger or mixed use developments, potential for use of consolidation centres should be explored, to reduce the number of servicing trips generated by the site.</u></i></p>		
R13 Optivo	14	<p>- Page 24 – paragraph 2.54 – cross referencing to the biodiversity guidance on page 34 may be beneficial.</p>	Y	Accepted. We added cross reference to Urban Greening and Biodiversity guidance on page 40.
R15	36	<p>Gardens para 2.55</p> <p>New gardens are not large and often too small to have their own tools, shed & compost bins . Large solid larchlap type fences should be avoided as vulnerable to strong winds.</p>	N	Noted. This level of detail is not considered necessary within the guidance document.
R15	37	<p>Are washing lines a thing of the past?</p>	Y	<p>Additional bullet has been added to para 2.63</p> <p>'consider providing washing lines as outdoor drying reduces energy consumption'</p>

				NOTE – we have also spotted an error (the text at bullet 3 should be at the end of Bullet 2). This has been corrected.
R51	4	<p>Additional paragraph to tie in <i>Kerbside Strategy</i>, although the crossover policy is not advanced enough to reference here:</p> <p><u><i>2.60 Lambeth’s Kerbside Strategy seeks to reduce the number and impact of vehicular crossovers to ensure footways are safe from conflicting movements. Proposals for new vehicular crossovers to access off-street parking are unlikely to be acceptable.</i></u></p>	Y	Accepted we have added new para at 2.62 as proposed.
R04 City Planning	2	<p>Roof Terraces</p> <p>Policy H5 of the Lambeth Local Plan (the LLP) deals specifically with Housing Standards. Criterion Bii states that for new flatted developments amenity space should be provided in the following quantities: “10m2 per flat either as a balcony/terrace/private garden.” Paragraphs 5.32-5.33 of the explanatory text sets out why outdoor space is so necessary. Moreover, the latter paragraph states that “the use of roof areas for additional amenity or garden space is encouraged.”</p> <p>In light of the above, there is clear policy support for roof terraces, in principle. This should be reflected in the SPD, i.e. Lambeth encourage roof terraces particularly on non-designated assets.</p> <p>This is important because the amount of amenity space one can provide affects the number of units schemes can deliver. This is particularly the case with change of uses and residential conversions, where it can be more difficult to provide outdoor amenity space, as opposed to a new build development where balconies can be added. This is relevant</p>	N	<p>Noted</p> <p>Part 2 of the Design Guide makes specific reference to roof terraces as amenity spaces with guidance provided at paragraph 2.64.</p> <p>Guidance for building alterations and extensions is covered in Part 4. There is specific guidance relating to the addition of balconies to existing buildings at Para 4.22</p> <p>Given the site-specific nature of conversions and issues of neighbour proximity etc, it is difficult to provide further detailed guidance that might be useful.</p>

		<p>because if private amenity space is not provided, units will only be allowed if they are significantly larger than London Plan space standards. Therefore, the provision of amenity space will have a direct influence on housing and small sites targets in the borough.</p> <p>To this end, it would be very helpful if examples of good practice can be provided both within and outside of non-designated assets. The examples on page 27 are all of new build developments and not flat conversions and change of use schemes. It would also be helpful to have examples and guidance on balconies as it may be possible to erect balconies on the rear of properties that have flat rear elevations.</p> <p>Below is an example of a residential conversion scheme City Planning obtained planning permission (LPA ref: 18/03575/FUL) for at 397 Clapham Road. The building had a flat rear elevation and through extensions and the provision of several flat roofs, roof terraces could then be provided. This in turn enabled more flats to be provided because flats did not need to be oversized in order to make up for the lack of amenity space.</p>	
R04 City Planning	3	<p>As a final comment, in relation to paragraph 2.58(4) it is not always possible to provide balconies off living rooms as part of residential conversions, particularly where terraces are provided off rear returns where the narrow width of the return lend themselves to bedrooms and not living rooms. Guidance should reflect this and state that where it is not possible to provide amenity space off living rooms, bedrooms should be considered.</p>	<p>N Local Plan Policy H5 does not state that private amenity space must be provided from living rooms. However, it is by far the preferred situation. The general guidance content in para 4 is therefore correct. See below.</p> <p><i>'4.Ensure that the shape and proportion of the balconies allow for practical use. For example, they should not be long and narrow and should serve living rooms rather than bedrooms.'</i></p> <p>Exceptions to this approach are best dealt with on a case by case basis with the applicant making</p>

				a case under the 'comply or justify' approach outlined in part 1 of this document.
R7	2	<p>Recessed balconies</p> <p>My main response is with regard to recessed balconies. As someone facing the prospect of the estate I live on being rebuilt I am likely to be offered one of these in future.</p> <p>My objections to them are these -</p> <ol style="list-style-type: none"> 1.They reduce the total living space of the flat. Outside space should be an addition to indoor living space. 2. They reduce the available natural light both to the balcony itself but even more importantly to the room that they are attached to - most often the living room. <p>Natural light is important for mood and good mental health, and for access to sunshine to make vitamin D. (Particularly important for anyone with mobility issues who may not access the outdoors with ease - including older age groups). Also balconies are the resident's personal outside space and may be used as growing/garden space. Poor natural light will affect what can be successfully grown. Being able to grow plants is also important for personal wellbeing and in future we will more and more be expecting to grow some of our own food if we can.</p> <p>Whilst future buildings will also have to take account of climate change and being able to keep the inside cool, this should be done by good insulation; incorporating continental-style shutters as standard and good planting schemes to provide natural screening and shade by trees, not by inset balconies so that they and the rooms behind them are deprived of natural light.</p>	N	<p>The SPD is guidance which has been prepared to support the implementation of the Lambeth Local Plan 2021. Policy H5 of the local plan stipulates that all residential development should be dual aspect, meet the minimum private internal space standards set out in London Plan policy D6; and sets out the requirements in addition to this for private amenity space of at least 30sqm for private house or 10m2 per flat either as a balcony/terrace/ private garden. Part 2 of the SPD provides guidance on balconies and terraces at Para 2.58, there is no specific preference for recessed balconies in Lambeth, the location and type of balcony is assessed on a case by case basis informed by the site characteristics. Para 2.27 provides further guidance on sunlight and daylight.</p> <p>Sustainability matters are addressed in:</p> <ul style="list-style-type: none"> • Part 1 – Understanding Lambeth (sets out the sustainability policy framework) • Part 2 – Design Advice for All Development (includes guidance on biodiversity and urban greening) • Part 3 – New Buildings (includes guidance on sustainability, circular economy, whole life-cycle approach, energy hierarchy, renewable energy)

				<ul style="list-style-type: none"> • Part 4 – Building Extensions, Alterations and Retrofit (includes guidance on retrofit and climate change) • Part 5 – Basements (includes guidance on sustainable design and construction)
R15	38	Communal amenity spaces para 2.59 This section should refer to play spaces section.	Y	Additional text has been added to Para 2.65 bullet 3. <u>'See guidance elsewhere in this section relating to play space etc.'</u>
Child Friendly Lambeth				
R13 Optivo	15	<p>- Page 30 – paragraph 2.63 – point 2 – an additional bullet point may be useful to highlight the need to ensure an appropriate mix of units on a site wide basis e.g. to avoid an over concentration of single occupancy units in the same building as a small number family size units.</p> <p>A third bullet point is included but without any text. Some text may therefore be missing from this paragraph.</p>	N Y	<p>Content relating to dwelling mix is not considered appropriate in this section of the guidance.</p> <p>The stray bullet has been removed</p>
R12 Child Friendly Lambeth	1	<p>I've attached our Child Friendly logo, plus a high-res version of it for convenience. Please also see attached the UNICEF UK Children's Rights Impact Assessment document.</p> <p>With regards to the title of the Child Friendly section in the Design Guide, please could the title be: "Child Friendly Lambeth".</p>	Y	We have included the child friendly logo and retitled the Child Friendly section to 'Child Friendly Lambeth,
R12 Child Friendly Lambeth	2	<p>Paragraph re child friendly Lambeth for the SPD Lambeth engaged on the UNICEF UK Child Friendly Communities Programme in November 2021 and has so far consulted with around 1500 children and young people to gain their views. Lambeth is striving to ensure that it is a place where children's rights and voices are at the heart of everything we do. Our key programme objectives are for</p>	Y	We have added suggested text before Para 2.67

		<ul style="list-style-type: none"> •For all decision making, services and support to be underpinned and informed by the rights of the child. •For children and young people in Lambeth to have a meaningful say in shaping local decisions that affect their lives and the space they live in. •Lambeth to put the needs and lived experiences of children and young people right at the heart of our thinking. •Lambeth to become a safer, supportive and even more exciting place to grow up in where all children and young people, especially the most vulnerable and disadvantaged, have equity of opportunity to grow and thrive. 		
R12	3	Add summary and link to the CFL consultation results. Outline CFL badge priorities.	Y	In the Child Friendly section. We have added link and summary of CFL consultation results. Added summary of CFL badge priority.
R15	39	<p>Child friendly borough (para 2.61)</p> <p>This section is very welcome giving developers a new concept to consider. Best thing for children is a net zero world!</p>	N	Noted
R15	40	<p>Some additional guidance might be appropriate here:</p> <p>https://www.london.gov.uk/sites/default/files/ggbd_making_london_child-friendly.pdf</p> <p>https://uploads-ssl.webflow.com/54d994286e733d1b30f8910e/5ed2ab913b79977e555395b0_Child_and_Youth_Friendly_City_Strategy_City_of_Surrey.pdf</p>	Y	Link to Mayor of London research report has been added at the end of Para 2.75

		https://www.publicpractice.org.uk/uploads/PN012_Planning-with-Young-People_V1.pdf		
R15	41	<p>These paragraphs need to be tailored more for Lambeth and focus on children living in flats. 50% of babies now born in the UK to households in private renting and affordability & stability of tenure are crucial in a child friendly borough.</p> <p>Important that child friendly is not just about play. Block design is important and design within flats – quiet study space, toy storage, bikes too small for adult cycle hangars. Easy routes to nearby school & health facilities. Children’s needs change as they grow older.</p>	N	Noted.
R15	42	Please clarify yellow/orange light. (para 2.63, 3, bullet 7) Dingy corridors are unattractive. LED saves energy. Lighting inside a home is a personal choice.	Y	The reference to orange lighting on para 2.74, 3 has been deleted to avoid confusion.
R20 EcoWorld	2	<p>EWL is strongly supportive of the focus on the role of new development in meeting Lambeth’s objective of being a ‘Child Friendly Borough’, reflecting its ambitions to be recognised as a UNICEF Child Friendly Community. Part 2 of the draft Design SPD sets out meaningful actions to this end, including involving young people in the design process of new development, and providing family accommodation which responds positively to their needs both within the home and in relation to their position in the wider development, alongside usable communal amenity spaces and public realm.</p> <p>EWL is committed to working with the local community in shaping masterplans and ensuring that development leaves a positive legacy. A dedicated team ensures that local people benefit from employment and training opportunities and works to support local community organisations and groups.</p> <p>As part of the new masterplan for Aberfeldy Village in Tower Hamlets, EWL with partner Poplar Harca, undertook a bespoke engagement</p>	N	Noted

		<p>programme with local young people; ZCD architects worked with local schools and created a youth manifesto, setting out the objectives for the new development. An engagement programme for Knollys Yard has started with local groups and the community with walk and talks and topic-themed workshops.</p>	
R20 EcoWorld	3	<p>We note within Part 2 of paragraph 2.63 that the SPD seeks for larger homes in taller buildings intended as family homes to be concentrated to the bottom five storeys, on the basis this would encourage easy physical and visual connections with the ground level.</p> <p>We would highlight that such an approach does not consider the unique quality of and experience within accommodation provided to upper floors in terms of views and outlook, alongside the potential closer proximity to deck or roof-level outdoor amenity spaces, which may be preferable to ground floor amenity in some instances given the greater level of safety and security afforded, alongside likely greater levels of daylight and sunlight which can support, for example, food growing, which may not be as achievable at ground level.</p> <p>Overall, the specification that family homes be below fifth-floor level represents an unnecessary detail and prescription when a desirable and appropriate choice in design may result in family homes above the fifth-storey level. As such, we would recommend that this be removed from the draft SPD.</p> <p>If the requirement is not removed, we would recommend that this paragraph is revised to instead require developments to demonstrate how family accommodation has been positioned throughout a development to ensure access to a range of external amenity has been considered, alongside any management functions required to support this.</p>	<p>N Accepted. The text at Para 2.74, 2, bullet 2 has been amended to read:</p> <p><i>Larger flats in taller buildings intended as family homes should <u>ideally</u> be concentrated in the bottom 5 storeys to encourage easy physical and visual connection with the ground level. <u>Where not possible applicants should demonstrate how the needs of children are met by other means.</u> Internal communal circulation areas from the lobby, to stairs, landings, corridors and decks should encourage use of stairs. There should be natural lighting and ventilation in every part of the communal circulation areas</i></p>

R20 EcoWorld	4	Remove bullet point 2 of Part 2 of paragraph 2.63 from the SPD, or revise to instead require that developments demonstrate how family accommodation will be positioned for optimal access to a range of external amenity areas;	Y	Accepted. See response to R20 3
R50	1	<p>Following the workshop on Child Friendly Lambeth here are some helpful links;</p> <p>https://www.makespaceforgirls.co.uk/ specifically https://www.makespaceforgirls.co.uk/our-work/design-professionals</p> <p>Having been to several workshops on this – key points are that MUGAs and Skate parks are not the silver bullet to teenage provision and exacerbate girls’ exclusion. Swings are popular. I can see a difficulty in this as most of our applications for things like this come internally and so parks need to be aware and design from an early stage.</p> <p>LLDC are working on Gender inclusive design guidance following the publication of a research report into the Olympic Area (https://www.queenelizabetholympicpark.co.uk/-/media/220530-safety-of-women-and-girls-consultation-report.ashx?la=en). I noted that our VAWG team have undertaken a consultation project on issues within Lambeth (https://www.lambeth.gov.uk/consultations/have-your-say-safety-women-girls-public-spaces-lambeth) – I don’t know whether we can put in some sort of flag that developers should pay heed to specific issues in their local area?</p> <p>Separately Hackney have a Child Friendly Place SPD - https://hackney.gov.uk/child-friendly-spd there may be some helpful things in here?</p>	Y	<p>Accepted. We have added link to Make Space for Girls campaign website at the end of Child Friendly section at Para 2.76. Minor text amendments to Para 2.74, 4, bullet point 6 to highlight gender and teenage girls.</p> <p>We have added additional guidance to para 2.74 point 4 to highlight recommendations in the LLDC research report regarding lighting and safety. We have included link to the report in the public realm section at para 2.45 as research relates to women and girls.</p> <p>In Part 1 of the Design Guide SPD and at para 2.71 we have highlighted the specific Child Friendly Lambeth priority badges which are specific to Lambeth.</p> <p>The Child Friendly Place SPD (Hackney) was reviewed in drafting the Lambeth Guidance</p>
R15	43	Play is no just a destination but a journey.	N	Part 4 already talks about routes and streets.

R15	44	Specific guidance on play space above ground floor would be welcome eg how does a roof play space get overlooked. Does it have to be netted or caged? What features does a private balcony need to become a play area? Where is nearest ball play area? Wet play & messy play?	N	Detailed guidance on roof top play is not considered necessary as designers will have to meet requirements of the building regulations. Policy has minimum dimensions for balconies.
R15	45	Immediate home based play areas are not the same as destination play areas like parks or schools. Less structured but flexible spaces near home will be more appropriate (equivalent to private back garden play). Best way to enable children to connect with culture is to participate (bullet 6 #4). Cultural institutions are usually at least one bus ride away from home.	N	Noted
R53 Ward Member	5	2.65 dedicated child playspace is a requirement in the LP, not simply "desirable"	Y	Accepted. We have amended para 2.79 as below: <i>2.79 Whilst separate, dedicated play grounds may be desirable is a requirement in large scale residential developments such as large estate regeneration schemes, it is accepted that dedicated play space is not always possible in smaller developments where limited open space must work hard to serve the whole community. That said this should not be used as an excuse to reduce play provision down to a few tokenistic boulders.</i>

R15	46	Urban greening & Bio diversity (para 2.71). Can this section be tailored more for Lambeth? The only existing woodlands, ponds, streams & wetland features are located in our parks which are protected from development.	N	General best practice guidance is considered sufficient to cover Lambeth's needs.
R13 Optivo	16	- Page 35 – paragraph 2.74 – reference is made to policies EN2 and EN4. It may be useful to include a green circle highlighting these policies on the left hand side as with other pages.	Y	Accepted. We have added policy references.
R13 Optivo	17	- Page 36 – paragraph 2.74 – reference is made to biodiversity net gain. It may be beneficial to broaden this point to highlight the fact that 10% net gain will be a mandatory requirement from November 2023. The reason being that individuals and smaller scale developers may not be aware of this requirement.	N	Noted
R15	47	The food supply of animals is key to biodiversity. Swifts eat aphids, flying ants, mosquitoes, hoverflies and small beetles. Supporting insects is more important than swift boxes for nesting.	N	The bullets in the second part of 2.74 already adequately cover insect habitats. NOTE – we have corrected the omission of a paragraph number in the second part of 2.75. An additional para. Number has been added.
R40	1	The reference to swift boxes is welcome but it would be advisable to recommend integrated swift bricks, a universal nest brick for small bird species, as these last the lifetime of the building, have no maintenance requirements, better temperature regulation with future climate change in mind, and aesthetic integration with the design of the building. These should be installed in accordance with best practice guidance, e.g. BS 42021:2022. The Lambeth Council ecology team may provide advice on this?	Y	Accepted. We have revised para. 2.88 bullet 12 <i>“Provision of bird boxes suitable for a range of species, both whether surface or tree mounted, or physically integrated into any new or retained walls, eaves and roofs. <u>The preference for the provision of integrated boxes/bricks, especially for swifts and other birds nesting in buildings, Bird boxes or integrated bricks must be installed in accordance with best practice guidance, e.g. BS 42021:2022</u>”</i>

R15	48	Species for planting should be selected to take account of climate change. The native UK flora is diverse and locally depends on soils and climate.	Y	<p>This is already captured under 'Planning and species choice' heading. However, the text has been enriched for clarity</p> <p><i>2.103 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 (including climate change tolerance), maintenance and attractiveness, it's role in the wider ecosystem of the region must be a priority.</i></p>
R15	49	Biodiversity has to anticipate drought and flooding as well as more heat and possibly more cold at times.	N	Noted
R24 Brixton Society	7	<p>Urban Greening and Biodiversity (paras 2.71-2.96)</p> <p>While we welcome the expansion of this section, the point must be made (perhaps in para 2.87) that trees grow and may eventually deteriorate. Future access may be needed for tree surgery or even removal.</p>	N	This reference is already included in the SPD at Para 2.102
R40	2	<p>Please advise caution to meet the requirements of the 1981 Wildlife and Countryside Act, and avoid disturbance of bats and nesting birds during the breeding season e.g. March to August inclusive.</p> <p>Note that scaffolding for external works may prevent birds such as swifts, an endangered red-listed species that is recorded in Lambeth, accessing their regular nest sites.</p>	Y	<p>Guidance has been added in a new paragraph after para 2.112 in the draft document. It reads:</p> <p><u>'Statutory Wildlife Protections</u> <u>Wildlife is afforded protection under the Wildlife and Country Act 1981 as amended by the Countryside and Rights of Way Act 2000.</u> <u>Statutory protection is given to birds (including nest sites), bats and other species. Tree work is governed by these statutes and advice should be sought before undertaking any works that may constitute an offence. For further information on</u></p>


				<i>this matter please contact Natural England at www.naturalengland.org.uk</i>
R13 Optivo	18	- Page 42 – Title – “Other Premeses” should be “Other Premises”.	Y	Accepted. We have amended title on pg. 48 to read ‘ <i>Shop Fronts and other premeses non-residential frontages.</i>
R24 Brixton Society	8	Shopfronts (para 2.97 on) It would be more appropriate to place this in the following sub-section, just before para 2.112. Apart from the typo in the heading, a better heading would be Shopfronts and other frontages.	Y	See R13 comment 18
R13 Optivo	19	- Pages 42–45 – the title above paragraph 2.97 on page 42 states “Existing Shop Fronts” but the guidance on pages 43-45 is also relevant for new shopfronts. For clarity, it may be useful to confirm that this section applies to both existing and new shopfronts.	Y	Accepted. We have amended title to include new shopfronts.
R15	50	Shop fronts (para 2.97) Any guidance on making new shop fronts distinctive to Lambeth?	Y	Accepted. We have added guidance in the shopfront section after para 2.117 on shopfronts with railway viaducts. Railway viaducts <i>2.118 <u>Brick railway viaducts are an established feature of some parts of Lambeth and much to the character of those areas by virtue of the unified appearance and linear, repetitive features. When designing proposals for railway arches designers should:</u></i>

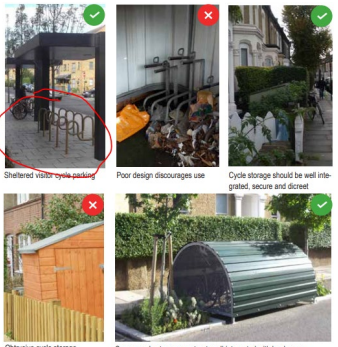
				<ul style="list-style-type: none"> • <u>Respect the unified appearance of the viaduct's brickwork structure</u> • <u>Inset any infill shopfront or similar within the arch by 200m from the viaduct face so that the arch profile is emphasised.</u> • <u>Contain fascia panels to within the arch itself, only signage formed of individual applied letters will be acceptable on the brickwork</u> • <u>Design and specify for security and robustness.</u> • <u>Include property numbers (these may be applied to the brickwork).</u>
R15	51	Many existing shop fronts have down pipes emptying onto pavements – how can this be remedied?	N	Downpipes are generally part of the historic building design and not part of the shopfront. As a result, removal is not an option in most instances.

R15	52	And very helpful to include street numbers on a shop signage to aid pedestrians way finding.	Y	<p>We have spotted the need for an additional title to separate the 'Existing Shopfronts' section from the rest of the guidance. Therefore, the following text has been inserted just before the Pilasters heading:</p> <p><u>'Shopfront Design Considerations</u> <u>The advice below is relevant for designers of shopfronts.</u></p> <p><u>Property Number</u> <u>In accordance with Policy Q16 the property number of the premises should be permanently clearly and displayed at the shop entrance. This can be on the glass, fascia or pilaster etc.</u></p>
R15	53	<p>Building Construction detailing (para 2.111)</p> <p>No mention of fire risks</p>	N	This is covered by separate legislation and guidance.
R15	54	What is the expected lifetime of a structure and how much repair should it need? Why not require sight of repairs contract as part of planning process for blocks of say 10+ homes?	N	These matters go beyond planning control. It would be unreasonable for the LPA to provide guidance.
R13 Optivo	20	- Page 47 – paragraph 2.113 – whilst the principle of conditions requiring additional detail is welcomed, it may not be possible to retain the designer at the later stages for reasons outside of the developers control. This type of condition therefore needs to be agreed with a developer on a case by case basis.	N	Noted. Conditions are determined on a case by case basis by Development Management Officer
R13 Optivo	3q21	- Page 48 – paragraph 2.114 – reference is made to Policy Q25 but the policy is missing from the green circles on the left hand side.	Y	Accepted. We have added policy reference to Q25

R13 Optivo	22	- Page 51 – paragraph 2.118 – reference is made to Policy Q13 but the policy is missing from the green circles on the left hand side.	Y	Accepted. We have added policy reference to Q13
R4 City Planning	5	<p>Cycle and Waste Stores</p> <p>Such facilities can be difficult to provide on existing sites, particularly residential conversions, where outdoor space can be at a premium. It can often result in applications being significantly delayed, taking up valuable officer resources as matters are resolved.</p> <p>It would be helpful therefore, if visual images and case studies of residential conversion schemes can be provided in order to show best practice and how constraints have been overcome. Sometimes it is not possible to provide such facilities externally, therefore guidance on how to provide these requirements internally would be welcomed. The photos within the draft SPD tend to be of new build schemes where it is much easier to provide such facilities.</p> <p>City Planning recently obtained planning permission (LPA ref: 19/03244/FUL) for a scheme at 126-128 Lyham Road whereby we provided both cycle and waste stores within the flat because there was no outdoor space. Detailed plans of waste and cycle storage was supplied to officers in order to give them assurances that these facilities would be appropriately provided for.</p>	Y	<p>Accepted. The Council provides separate stand-alone guidance on refuse and recycling storage which includes a wide range of scenarios and solutions. That document is separate so that it can be updated easily in conjunction with these responsible for waste collection.</p> <p>Part 2 ‘Design Guidance for All Developments’ contains general cycle storage design guidance which is applicable to conversions. We propose to add an extra bullet there at para 2.126:</p> <ul style="list-style-type: none"> • <u>consider providing internal cycle storage especially where external space is limited / would better serve amenity needs.</u>
R01 Metropolitan Police Service	1	<p>As your DOCO Officer I would like to add a recommendation to the SPD around Cycle Storage. (2.118)</p> <p>Currently, planning conditions are commonly applied to successful planning applications that dictate requirements for communal mass cycle storage. It is my belief that in doing so, vast swathes of real estate are wasted because residents do not make full use of this type of cycle storage area. The reason for this belief is based on a number of factors;</p>	N	<p>Officers are aware of the issues raised and are mindful of them when assessing schemes.</p> <p>The design guide does not provide model conditions and therefore it would not be appropriate to add content on planning conditions here.</p>

		<ol style="list-style-type: none"> 1. I have conducted multiple anniversary visits to developments that have achieved SBD status. Commonly – the bicycle storage areas are used to less than 10% capacity – yet there are bicycles stored on private balconies. 2. Most cyclists now own bikes which are worth in excess of £1000. 3. To obtain Cycle insurance for such a bike, the owner must demonstrate that their bike is kept in a secure place. Most insurance providers do not consider mass bicycle storage area to be safe enough (even with SBD certification) Consequently – bicycle owners resort to putting their bikes inside their home.....or on the balcony. 4. Anniversary visits to mass communal cycle storage areas have shown that items such as cardboard boxes, old mattresses and other assorted unwanted household items are routinely stored in bike stores. <p>To remedy the loss of real estate to mass (unused) bicycle stores, and to come up with an Insurance compliant solution, I suggest that future planning conditions for bicycle storage should require a purpose built locker inside each unit, which can hold at least two bicycles vertically on a hook etc.</p> <p>This way;</p> <ol style="list-style-type: none"> 1. cyclists get <u>insurance compliant</u> bike storage. 2. Developers do not over spend on bike racks and real estate space that won't be used. 3. Non cyclists get extra storage within their unit. 		<p>It is not a Lambeth policy requirement to provide large communal mass cycle storage instead favouring well integrated communal cycle storage areas be broken down into a number of small secure facilities preferably with cycle lockers provided for each flat and numbered accordingly in order to ensure cycles are safe from theft and damage.</p> <p>Additionally, it is a requirement that cycle storage be robust and secure.</p> <p>Given the above changes to the guidance are not considered necessary.</p>
R15	55	<p>Cycle storage (para 2.118)</p> <p>What about children's' cycles?</p>	N	<p>Specific guidance on this topic is not considered necessary. The general guidance is considered adequate.</p>
R15	56	<p>The 5% disabled cycle rule can only apply to stands of 20 cycles or more.</p> <p>What form does disabled cycle parking take?</p>	N	<p>This is currently secured and included in Local Plan Policy T3 Cycling, that requires "in all</p>

			<p><i>developments at least 25 per cent of the total cycle parking provision should be of the most accessible type, such as ‘Sheffield’ stands (with standard minimum 1m spacing), of which five per cent of the total cycle parking provision should be designed and clearly designated for larger and adapted cycles”.</i></p> <p>Disabled cycle parking would typically take the form of Sheffield stands, with circa 2m spacing between stands to allow larger or adapted cycles (ie. handcycles, tricycles, tandems and models to suit the rider’s specific needs, as well as cargo cycles) to be secured and easily manoeuvred.</p>
R51	5	<p>Link requires update.</p> <p>The included picture does not accord with Lambeth’s ‘Refuse & Recycling Storage Design Guide’ (2022)</p> 	Y Accepted. We have amended link as proposed and replaced bin storage image.

		<p><i>“Below ground storage is no longer supported. They have proven problematic for a number of technical and practical reasons and are no longer considered acceptable on schemes where the rubbish and recycling are collected by Lambeth Streetcare.”</i></p> <p>Waste and recycling storage 2.117 Given the importance of this subject to the quality of life of residents see Lambeth’s ‘Refuse and Recycling Storage Design Guide’. See https://www.lambeth.gov.uk/sites/default/files/2022-05/refuse%20and%20recycling%20design%20guide%202022.pdf</p>	
R51	6	<p>Cycle Storage</p> <p>Links to London Plan and Local Plan need updating:</p> <p>We generally push for Sheffield stands over other designs like the below picture:</p>  <p>Additional points required:</p> <p>Cycle Storage</p> <p>2.118 Having consideration to the technical requirements relating to capacity etc. as set out in the London Cycling Design Standards:</p>	Y Accepted. Amendments as proposed. Updated links, Sheffield stand cycle storage and amendments to points as proposed.

[LCDS Chapter 8 Cycle Parking \(tfl.gov.uk\)](https://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf)

<https://content.tfl.gov.uk/lcds-chapter1-designrequirements.pdf>

Designers should:

1. Integrate the design into the scheme, designing for longevity of performance and appearance. Detail structures to be attractive, robust and fit for long-term service.
2. Sturdy permanent construction is essential with proper paving and roofing (with gutters etc.) and secure door.
3. Ensure excellent security performance through use of materials (timber discouraged), effective lighting and good design (bikes should be screened from public view)
4. Subdivide large communal stores so that smaller numbers of immediate neighbours share the same facility. This improves security and encourages neighbourliness.
5. Ensure that users and cycles are adequately protected from the elements.
6. Remember that the use of tiered storage is discouraged as this can be hazardous to use and is not inclusive.
7. Ensure that 25% of all cycle parking is *of the most accessible type, such as 'Sheffield' stands, of which 5% of the total cycle parking provision should be designed and clearly designated for larger and adapted cycles.* ~~allocated for Disabled users, matching equivalent provision for disabled car users.~~
8. Ensure that access doors to cycle storage facilities are a minimum of 2011100mm.
9. On larger schemes designers should consider use of automatic doors that allow for efficient and convenient ingress and egress for all users.
10. Cycle and refuse storage should be within separate stores.

		<p>Policy Q13's supporting text also provides design advice. For further information, please refer to the London Plan which sets out cycle parking standards under Policy T5. See: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf</p> <p>The Lambeth Local Plan also provides quality guidelines set out under Policy Q13 and T3. See https://www.lambeth.gov.uk/sites/default/files/2021-09/Lambeth%20Local%20Plan%202021.pdf</p>		
R51	7	<p>Additional points required:</p> <p>Residential boundaries</p> <p>2.125 Low front boundaries are a key aspect of Lambeth's established visual character and play an important role in defining public and private space and improving security. Designers should:</p> <ol style="list-style-type: none"> 1. Retain existing boundary treatments where they contribute positively to local distinctiveness. 2. Ensure that front boundaries to residential buildings (to the street and between plots) do not exceed 1.2m. 3. <u><i>In accordance with Policy Q15, boundaries flanking a vehicle crossover to not exceed 900mm in height.</i></u> 	Y	Accepted amendments made to para 2.127 as proposed.

PART 3 – DESIGN ADVICE FOR NEW BUILDINGS

Respondent no.	Comment no	Comment	Y or N?	Edit
R34 Lambeth Village	3	<p>Part 3 <i>'3.3 Whilst the demolition and redevelopment of heritage assets and buildings that make a positive contribution to the special interest of conservation areas is discouraged.'</i></p> <p>'Discouraged' in the above seems particularly weak, contrasting with the protection of the heritage elsewhere in the documents.</p>	Y	<p>Accepted. We have amended text.</p> <p><i>3.3 Whilst the demolition and redevelopment of heritage assets and buildings that make a positive contribution to the special interest of conservation areas is discouraged †The redevelopment of existing buildings elsewhere can often <u>may</u> be the most efficient means of optimising site development. Designers should:</i></p>
R45	3	<p>With regards to paragraph 3.4 (Optimising Development Potential) please reword this section to reinforce, clarify and give weight to the final sentence. In certain cases over development is being sought to be justified by an emphasis by applicants that the balance of public benefits outweigh the public harms. Whilst I appreciate that all developments have some level of harms, I am concerned by the interpretation by planning applicants that SPD para 3.4 entails and encourages.</p> <p>There is a wide degree of subjectivity in interpreting what is the actual level of optimum density which is existing planning policies do not address, particularly the current London Plan. Optimum density when applied to those external to the site</p>	Y	<p>Optimisation comes from London Plan Policy D3 and there is associated Mayoral Guidance. Both seek to take s subjectivity out of assessment. We have added reference to the associated mayoral guidance 'Optimising site capacity: Design-led approach LPG' in Part 1 of the SPD and at Para 3.4</p>

		should not result in any material deterioration in quality of habitably and wellbeing.		
R53 Ward Member	6	Part 3 (3.4) should reference 'Optimising Site capacity, A Design Led Approach' LPG adopted 08/06/23	Y	Accepted. See response to R45 comment 3.
R19 Homes for Lambeth	5	<p>Optimising Development Potential</p> <p>Part 3, page 4 of the SPD sets out the general approach to new buildings within the Borough and paragraphs 3.4 to 3.7 summarises the approach which should be taken to optimising development potential. Paragraph 3.4 states "Designers should guard against over-development by ensuring the development capacity of the site is optimised and not exceeded...The first step is ensuring all established planning policy and other development / sustainability standards are met."</p> <p>Policy D3 of the London Plan, Optimising site capacity through the design-led approach, establishes the approach which should be taken in optimising site capacity. The policy sets out that the objectives which development proposals should meet including form and layout, quality and</p>	Y	<p>Part accepted. Policy D3 of the London Plan is just one policy in the development plan as a whole. The requirements of D3 can't therefore be read in isolation. The SPD's flagging of the range of policy consideration is considered appropriate. However, for the avoidance of confusion the text has been amended:</p> <p><i>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 <u>fully considered at early design development stage</u> met. Further guidance is provided in the Mayor of London's 'Optimising site capacity: Design-led approach LPG'</i></p>

		<p>character. The policy does not require that “all established planning policy and other development / sustainability standards are met,” but sets out a check list and approach which optimises site capacity whilst meeting these objectives.</p> <p>As currently drafted, the SPD does not accord with Policy D3 and introduces an additional test which is not contained within the development plan. HfL is supportive of ensuring that developments meet relevant planning policy and standards but it is recognised that in the development of medium and high density schemes there will be times when certain standards are not fully met to meet wider design objectives and this approach is part of the appropriate planning balance.</p> <p>In addition, you will be aware that large scale developments are currently facing significant viability challenges brought about by inflation and the associated increase in build costs. It is predicted that this is likely to adversely impact on the delivery of schemes across Lambeth and London more generally. If schemes are not viable then the associated regeneration benefits derived from large scale developments will not be achieved. On this basis, it is suggested that the SPD includes reference to the importance of viability and ensuring that the design</p>		
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		objectives of the guidance are not at the expense of viability or delivery.		
R38	4	When you do try to discuss what you mean by optimisation, you mention excessive pressure on public realm or infrastructure. But, again, it is not clear at what point the pressure becomes excessive. When a new school is required? Or when people cannot cram on to a commuter bus or train? Or simply when good views of the City from back windows are spoilt by a cluster of new sky-scrapers?	N	No change. Para 3.4 seeks to guard against over-development (and its adverse effects) by promoting design-led optimisation.
R13 Optivo	23	Part 3 - Pages 4-11 – we support the guidance throughout this section and the statement at paragraph 3.6 that “Detailed analysis of a site at the outset of the design process is essential”. It may be beneficial to include a paragraph that encourages developers to refer to this guidance in pre-application documents and design and access statements. A summary paragraph may also be useful given the comprehensive level of guidance provided.	Y	Additional text has been added to the end of para 1.1 in Part 1 of the SPD. The additional wording is: <u><i>‘Applicants are therefore strongly encouraged to give the fullest consideration of this guidance when preparing schemes and to refer to it, where relevant, in their planning statements and design and access statements.’</i></u>

R34 Lambeth Village	4	<p><i>'3.7 Redevelopment of sites should enable broader issues to be addressed from the outset, these include; climate change mitigation and adaptation, urban greening and biodiversity, creating inclusive environments which make a positive contribution to health and well-being and integration with the Healthy Streets Approach to promote active travel and low traffic neighbourhoods.'</i></p> <p>'Should ' in the above is a weak word, it must be the case that where demolition is allowed then there is a solid requirement to fully meet climatic and environmental standards. Lambeth has declared a climate emergency so it must see this as non-negotiable when a site is cleared and so no longer compromised by existing structures.'</p>	N	<p>Not accepted. This is a guidance document and it has to hang off adopted policy. The use of 'must' would be unacceptable as the guidance can't ask more than the policy it supports.</p>
R15 Ward member	57	<p>Para 3.11 This contradicts Part 1 which emphasises human scale characteristic of Lambeth</p>	N	<p>No change.</p> <p>Part 1 provides an overview of the whole borough where there is a varied mix of architecture and typologies including higher densities. Para 1.46 highlights the human scale of Lambeth as one of its strengths which can still be maintained when considering higher density where the relationship of new development with the street should be carefully considered through careful massing and façade articulation. The aim of Para 3.11 is to reinforce Part 1 by providing guidance on how taller buildings where appropriate can assimilate into local context in Lambeth.</p>

R34 Lambeth Village	2	<p><i>'3.11 With the need for continued growth in Lambeth and in recognition that London's character is ever-evolving much of the new development coming forward is going to be taller than its current context. In some instances development may be substantially taller. Designers should:</i></p> <p><i>1. Step massing down in sensitive locations where it would be desirable to respond positively to established context; especially heritage assets and in relation to neighbour amenity.'</i></p> <p>The above first sentence says development can be taller or substantially taller and it is only in sensitive locations where it would be desirable to step massing down. This principle should apply to all taller buildings where it is in juxtaposition with local character.</p> <p>The use of the word desirable rather than must makes this sound optional and is weak.</p>	Y	Accepted. The word 'sensitive' has been deleted from the text.
R24 Brixton Society	9	<p>We welcome the latest paragraphs 3.3, 3.4 and 3.15-3.39.</p> <p>However, we object to the assertion in para 3.11 that there is a "need" for "continued growth" in Lambeth. This is patently not a sustainable approach, and will inevitably devastate the borough on the model recently applied around Vauxhall and Nine Elms.</p>	N	No change. The Local Plan and London Plan both seek to achieve 'good growth' and the SPD guidance follows that approach.

R21 Historic England	3	Part 3 - we have concerns with the approach to tall buildings advocated in Part 3 of the SPD, for example on page 6 regarding tall buildings. What is considered tall is relative, so even buildings a few storeys higher than the prevailing context maybe be read as tall.	Y	<p>Part accepted. Policy Q26 of the Lambeth Local Plan defines tall building heights for the whole borough. To avoid confusion para 3.54 has been amended:</p> <p><i>3.54 <u>Policy Q26 of Lambeth Local Plan defines tall building heights across Lambeth.</u> 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 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.</i></p>
R21 Historic England	4	Page 6 effectively establishes the principle that the majority of new development that comes forward will inevitably be taller than the surroundings, and therefore acceptable, which places the SPD in potential conflict with local policy Q26 and the London Plan as it builds in harm from the outset. The SPD suggests that the impacts of tall or taller buildings could be mitigated by placing them appropriately in views and using contextual materials. We do not agree that this would be adequate to avoid harm. Instead we recommend that the SPD encourages the exploration of other types building typologies and mid-rise development which can still deliver high density development without the same potential for harm -this is required in order to align with the London	N	<p>Not accepted. Para 3.11 includes the following:</p> <p>‘In some instances development may be substantially taller .’</p> <p>That text does not establish the principle that the majority of new development that comes forward will inevitably be taller than the surroundings, and therefore acceptable.</p> <p>However, the text has been added to provide clarification:</p> <p>Building Height and Mass - Conventional Frontages</p> <p><i>3.11 With the need for continued growth in Lambeth and in recognition that London’s character is ever-evolving much of the <u>major</u> new development coming forward is likely going to be taller than its current context. In some instances development may be substantially taller. <u>Where development is taller than its neighbours designers should:</u></i></p>

		Plan (policy D9 part C (d)). The SPD also introduces, in effect, the concept of "taller buildings" which is confusing and again creates a potential conflict with the adopted development plan which does not include a definition of "taller buildings".		
R14	1	I just want to point out that part 3 - New Buildings - appears to make a couple of mentions of respecting relative heights of adjoining buildings. If that is the case, how can permission be granted for the new 'skyscraper' Hondo building, which would be an order of magnitude larger than any building in the entirety of Brixton town, and loom terribly over the entire centre of the town?	N	Noted. Whilst the Hondo building was approved at planning committee it is still awaiting decision for planning permission.
R23	1	I just want to point out that part 3 - New Buildings - appears to make a couple of mentions of respecting relative heights of adjoining buildings. If that is the case, how can permission be granted for the new 'skyscraper' Hondo building, which would be an order of magnitude larger than any building in the entirety of Brixton town, and loom terribly over the entire centre of the town?	N	Noted. No change. Whilst the Hondo building was approved at planning committee it is still awaiting decision for planning permission.
R38	3	Elsewhere in the report, you talk about the importance of Lambeth architecture being of a human scale. You also talk, in the context of tall buildings, of the importance	N	It would not be appropriate here to discuss specific sites that are in design development.

		of human scale at ground level and the avoidance of tall towers which loom uncomfortably over low-rise neighbours or pedestrians. I agree, but feel that these statements are in contradiction to Lambeth's encouragement of a proposal for West Norwood involving a 22-storey block and two of around 10 storeys.		
R15	58	Para 3.15 The zero carbon target must include carbon cost of original building and any demolition.	N	Noted Links are provided to the Mayor's SPG where this matter is explored in more detail.
R53 Ward Member	7	Part 3 (3.15) reference to the Mayor of London's Sustainable Design and Construction SPG, (2014) – this SPG has been revoked	Y	Accepted we have removed reference to the Sustainable Design and Construction SPG, (2014).
R15	59	Para 3.16 Is target for new homes to produce 75-80% less day to day carbon emissions. Does this lifetime target include embodied carbon in demolition & construction?	N	Noted. Links are provided to the Mayor's SPG where this matter is explored in more detail.

R15	50	Para3.17 How are tall buildings to be adapted, reconstructed & deconstructed over time?	N	The circular economy principles apply to buildings of all scales 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.
R53 Ward Member	12	Part 3 (3.18) Circular Economy links to the GLA 2020 draft LPG; this was superseded by a substantially re-written and more extensive final draft adopted in 2022.	Y	Accepted. We updated link to the Circular Economy Statement LPG 2022
R53 Ward Member	13	A WLCCA LPG was adopted at the same time in 2022. The text from 3.18 – 3.26 does not reflect both of these LPGs.	Y	Accepted. We have provided link to the Whole Life-Cycle Carbon Assessments LPG 2022 after paragraph 3.21
R15	61	Para 3.19 What about counting embodied carbon in existing building for demolition? Any guidance on use of “green concrete” ?	N	Para 3.19 refers to operational carbon emissions which accounts for the embodied carbon in existing building. This is general guidance which signposts to more detailed advice. It is not possible to provide detail on all matters here.
R15	62	Para 3.20 What figure is used for longevity of a building to calculate its whole life cycle carbon emissions?	N	This is general guidance which signposts to more detailed advice. It is not possible to provide detail on all matters here.
R38	6	One final point: there is quite a lot in the report, in the general approach section, on the whole life-cycle approach. I may be wrong, but surely tall buildings are much harder and messier to demolish when they reach the end of their life?	N	Noted.

R15	63	<p>TABLE on pages 11 and 12. How about including some basic archetypes ie terraces, semis, detached.</p> <p>An ordinary family home in Lambeth is a flat.</p> <p>No mention of triple glazing</p> <p>No mention of Passivhaus</p> <p>No mention of current & potential CHP networks</p> <p>No mention of green roofs</p>	Y	<p>This table has now been moved to Part 4 of the SPD at pages 55 and 56.</p> <p>This table has been written around the planning regulations which uses 'single family dwelling' as the basis for most permitted development. A single family dwelling is typically a house occupied by one family.</p> <p>A column has been added for 'flat'. Most external alterations to flats require planning permission.</p> <p>A row has been added for Triple glazing,</p> <p>passivhaus is achieved through a variety of measures and therefore it would be misleading to include a single row on it.</p> <p>A row as been included on 'domestic micro CHP' installation.</p> <p>A row has been added on green roofs</p>
R13 Optivo	24	<p>- Page 10 – paragraph 3.34 – we support the encouragement for designers of minor schemes to consider urban greening.</p> <p>As mentioned in the comment above relating to page 36 of Part 2, it may be beneficial to highlight the fact that 10% net gain will be a mandatory requirement from November 2023.</p>	N	<p>Noted. The requirement to provide 10% biodiversity net gain will be enshrined in legislation (Environmental Act 2021). Given the legal requirement it is not considered necessary to repeat it in guidance.</p>
R34 Lambeth Village	5	<p><i>'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</i></p>	Y	<p>Accepted. Text has been amended to read:</p> <p>3.31 In order to comply with London Plan Policy SI1 requires, designers should <u>to</u> 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</p>

		<p><i>of the development, from demolition and construction through to operation.'</i></p> <p>This is not a should but a must in view of the boroughs commitment to healthy streets. Why put this so weakly?</p>		<p>at all stages of the development, from demolition and construction through to operation.</p>
R34 Lambeth Village	6	<p><i>3.43 Designers should:</i></p> <p><i>1. Meet the relevant space standards. 2. Achieve dual aspect layouts with practical room layouts 3. Anticipate the future needs of users by ensuring flexibility and adaptability are in the design, layout and construction. 4. Optimise daylight and sunlight (which might include roof lights and sun pipes on top floor units and using glazed doors borrowed light to bring light into halls and landings) both within flats and in common areas. 5. Avoid deep floor plans (to optimise daylight penetration and reduce daytime reliance on artificial light) 6. Optimise energy efficiency of space heat</i></p> <p>Surely these are not a should but a must, particularly space standards. It is unacceptable to design new build that is sub-standard.</p>	N	<p>No change</p> <p>The guidance is not policy and therefore it has to be read in conjunction with the relevant policies. The term 'should' is used consistently throughout the document. Its use here is considered appropriate.</p>

R04 City Planning	6	Para 3.48 We welcome this guidance and the approach to such development. We would question the requirement to provide a minimum of 2m for access (as set out in criterion 7) as this will rule out a lot of sites that ordinarily would be acceptable. Access should be assessed on a site-by-site basis as circumstances can vary e.g. the length of access.	N	This would be an example where the applicant, if they can't provide 2m, may choose to use the 'comply or justify' approach which would be assessed by the Council on a case by case basis against the relevant policy.
R37	2	"Ensure design excellence is achieved on the street frontage in relation to, legibility, security and the practicalities of mail boxes, refuse and cycle storage both in relation to the host building and the new house" design excellence? According to what standard? Please provide a definition.	Y	Accepted we have revised 3.49 point 11 to read: <i>'Ensure design excellence is achieved on the street <u>site layout enables building frontages and entrances in relation to</u> are well placed to aid legibility, security and <u>natural surveillance</u> in relation to <u>for</u> both the host building and new house. <u>Ensure building frontages and site layout integrate</u> the practicalities of mail boxes, refuse and cycle storage <u>at an early stage in the design process.</u></i>
R15	64	Residential development Para 3.52 A similar limit to 6 flat deck access flats should applied to flats with internal corridors – avoiding long anonymous hotel effect.	N	No change. The Mayor's Housing SPG already includes standard 12 on shared internal circulation which states that each core should be accessible to generally no more than eight units on each floor.
R13 Optivo	25	- Page 17 – paragraph 3.52 – safety and security require careful consideration in flatted developments. We therefore suggest adding an additional separate point regarding safety and security with a reference to the guidance on page 15 of Part 2.	N	Noted. Para 3.52 includes existing reference to Part 2 which amongst other guidance includes safety and security guidance for all developments therefore it is not considered necessary to further cross reference.

R37	3	For flats; "Ensure schemes are 'tenure blind' with residents having equal access to all communal outdoor amenity space." Can you confirm how this will be achieved/enforced	N	No change. All major proposals submitted as planning applications are assessed as part of the development management process, this includes design officer assessment which would look at the architectural treatment and detailing of the blocks against policy and guidance.
R15	66	Please also mention the issue of unpredictable service charges on residential high buildings, location of childrens play, fire safety (are 2 lifts now required) .Also the extra foundations and the carbon emissions, the requirement for electric heating.	N	No change. The remit of the SPD is to provide design guidance to support the implementation of local plan policies and as such service charges are considered beyond the scope of the guidance.
R51	8	Ensure refuse and cycle storage is <u>convenient, fit for purpose and provided within separate stores</u> convenient and fit for purpose.	Y	Accepted. Para 3.52 bullet point 5 amended as proposed.
R25 GLA	19	In order to maintain the integrity of your local tall building policy, and remain in general accordance with LP2021 policy D9, we suggest that this section of the guidance is updated to make clear that tall buildings will only be supported in areas identified as appropriate within annex 10 of your Local Plan.	N	Not accepted. Local Plan Policy Q26B allows for tall buildings to come forward outside the Annex 10 locations
R53 Ward Member	8	Tall buildings section: no reference to the LP requirement that locations for tall buildings	N	See response to R25 GLA comment 19. Further design guidance for tall buildings is already included after paragraph 3.55

		must be identified through the planmaking process (and therefore what developers need to do). A further criteria should be inserted with regard to how tall buildings meet the ground to avoid sterilizing the periphery around the tall building.		
R51	9	<p>Additional sentence required:</p> <ol style="list-style-type: none"> 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. <p><u>9. Any required physical mitigation must be contained within the site and must not encroach on the footway for example.</u></p>	Y	Accepted. We have added additional bullet point as proposed to Para 3.55
R25 GLA	20	Pg20 Tall buildings: There is some concern that the additional guidance on tall buildings within the draft document undermines the clarity of the Lambeth DPD. We suggest that this section of the guidance is updated to make clear that tall buildings will only be supported in areas identified as appropriate within annex 10 of your Local Plan.	Y	Not accepted. Local Plan Policy Q26B allows for tall buildings to come forward outside the Annex 10 locations

R21 Historic England	5	<p>With regards to tall buildings we request the SPD is amended to emphasis the thrust of policy Q26 which says that tall buildings are acceptable in principle only in areas identified as appropriate, or allocated as such in the forthcoming SADPD, and that although speculative applications may be acceptable, there is no presumption in favour of tall buildings outside these areas which will be subject to a greater degree of scrutiny as a result.</p>	N	<p>Not accepted.</p> <p>It is not considered necessary to repeat the Local Plan policy here. The guidance needs to be read in conjunction with the full policy.</p>
R17 Guys and St Thomas	5	<p>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 research that will serve the increasing population of Lambeth.</p> <p>Paragraphs 3.54-3.67 on Tall Buildings and Draft Policy Q26 states that tall building developments are required to include design considerations such as architecture, detailing, materials, form and silhouette.</p> <p>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</p>	N	<p>No change</p> <p>The guidance in the SPD is generic and can't respond to specific sites. Especially given the very high heritage sensitivity of the St Thomas' Hospital site and the complexities around view etc.</p> <p>The SPD guidance allows applicants to use the 'comply or justify' approach.</p>

		<p>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 Guide SPD may limit the options for provision of future healthcare growth.</p> <p>Whilst it may not be deemed acceptable to make reference to site specific matters, we do request that it be stated in the SPD that exceptions are made to ensure flexibility when considering applications for sites that are essential to existing and future Lambeth residents, and where their growth is necessary to meet growing need, such as hospitals and other healthcare facilities. Regarding the Zone of Theoretical Visibility (ZTV), for similar reasons above, it is requested that flexibility is also given in the SPD for sites such as hospitals and other healthcare facilities, when expanding vertically or horizontally is required to meet growing needs in the Borough and where there is no viable alternative.</p>		
R33	5	<p>We welcome the guidance for this increasingly important form, but would add that it should apply to all buildings over 30m across the borough, notwithstanding Lambeth's definition of a tall building at 45m – most buildings of between 30m and 44m would have considerable impacts on townscaping, heritage and amenity in most of the borough, and require greater</p>	N	<p>Not accepted. Q26 provides threshold definitions of building heights across the borough. There is no policy basis for a 30m height to be used in guidance.</p>

		consideration of those impacts. Alternatively consider applying some elements of this guidance to buildings between 30m and 45m.		
R42	2	The approach seems to be that tall buildings are necessary even if this is detrimental to existing homes and residents. Tall buildings benefit few except developers because they can cram more units in and they are mostly private with a very few social units, as little as developers can get away with. They are not always appropriate to development sites so should not be automatically encouraged. Who decides on design excellence and is the future of "Lambeth's local distinctiveness" to look like every other area in every other city?	N	Noted. No change. Design is reviewed by the independent Design Review Panel and Design Excellence is a matter of officer judgement.
R20 EcoWorld	5	We are also pleased that the draft SPD recognises the importance of both brownfield sites and the role of tall buildings in optimising available land (para 1.28), echoing the requirements of 2021 London Plan Policy D3. At paragraph 3.11, the draft SPD describes <i>"With the need for continued growth in Lambeth and in recognition that London's character is ever-evolving much of the new development coming forward is going to be taller than its current context. In some instances development may be substantially taller."</i> and at paragraph 3.54 <i>"When sensitively developed on appropriate sites tall buildings can enable the efficient use of land; site potential to be optimised</i>	N	Noted

		<p><i>and housing delivery to be maximised, in line with the London Plan... Given that tall buildings are by their definition 'substantially taller' than their context their impact is undoubtedly going to be greater."</i></p> <p>The above point is an important consideration and should be reinforced by highlighting that those areas described within the SPD as more suburban may see taller buildings come forward which will inevitably exceed the existing heights profile. The requirements of adopted tall building and wider design policies within the London Plan and Lambeth Local Plan, alongside this draft SPD, provide significant reassurance that such buildings would only be supportable if they represent a positive evolution for the area and secure significant public benefit. The ability of such developments of scale to deliver affordable housing, public realm enhancements, signpost town centres and infrastructure hubs, and encourage further investment, which is otherwise concentrated to the north of the borough, should be recognised.</p>		
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R20 EcoWorld	7	Supplement paragraph 3.54, or create a new paragraph, which expands upon the scenario where tall buildings come forward within the south, more suburban parts of the borough (the first part of the existing paragraph noting tall buildings are currently situated to the middle and north of the borough), that they will be expected to accord with relevant policies within the adopted Local Plan, adopted London Plan and any future site allocations DPD, alongside describing how such developments of scale should be recognised for their ability to secure significant public benefits, meet specific local needs and attract further investment to these parts of the borough;	N	Not accepted. The proposed additional text is not considered necessary as it provides no design guidance.
R15	65	Tall buildings (para 3.54) By definition tall buildings are not at a human scale in Lambeth. For placemaking process to work the local community will define what is human scale. Normally tall buildings stand out.	Y	Tall building facades can be detailed to respond to the human scale. The text has been amended to provide clarity: <i>Ensure that a human scale is created <u>by treatments and detailing; especially at the ground level. Avoid towers-treatments and designs which contribute to overscaled places, create a canyon effect with other tall buildings, which loom uncomfortably over low-rise neighbours or pedestrians.</u></i>

R24 Brixton Society	10	<p>Tall Buildings generally: (paras 3.54 on) This section remains of great concern to residents. Sadly, the Council has failed to enforce its existing policies (notably Q26) resulting in a rash of consents and proposals for unsightly tall buildings extending beyond the “preferred” tall building zones.</p> <p>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 18 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.</p>	N	No change. This matter was resolved through the local plan process. Local Plan policy Q26 provides threshold definitions of building heights as defined for Lambeth, which north of the South Circular is 45m.
R38	2	<p>I am concerned about Lambeth’s apparent enthusiasm for encouraging tall buildings in what seem to me and many other residents to be inappropriate settings. I wanted to take the opportunity to comment on this in the context of the design report as I have done in response to other documents. The section on tall buildings on p20 says that they can enable the efficient use of land when sensitively developed on appropriate sites. I would like the document to state that tall buildings may be inappropriate on sites where the prevailing height of existing buildings in the area is two or three storeys.</p>	N	Optimisation is set out in London Plan Policy D3 and in guidance ‘Optimising Site Capacity: A design led approach.’

		<p>At present, the main guidelines seem to be the optimisation of site potential in line with the London Plan (although you do refer to Policy Q26 which effectively rules out tall buildings in the suburban south of the borough).</p> <p>There is not much indication of what is meant by optimisation, or who decides whether a proposed development is the optimum (ie best) use of the land. Do residents have some say in this?</p> <p>I do note that in none of the examples pictured of good design are tall buildings set against two-storey suburban houses. They are all inner-city designs and older buildings next to them are four to six storeys.</p> <p>I propose that, from a design point of view, tall buildings over seven storeys in suburban settings I have described should be discouraged.</p>		
R37	4	<p>For tall buildings; "Seek well-proportioned architectural outcomes which will often 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." Can this be illustrated with some good and bad options please as otherwise it is somewhat meaningless.</p>	N	<p>Noted. It is not possible to illustrate every point. The absence of illustration is not considered to make the written advice meaningless. The illustration on bottom right of page 22 is considered sufficient.</p> <p>No change.</p>

R37	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" who defines 'exemplary'?	N	<p>Noted. No change.</p> <p>Most major proposals are assessed as part of a preapplication process by officers, Lambeth's Conservation and Design team and where applicable Lambeth's independent design review panel.</p> <p>Key major schemes are reviewed by the officers at the GLA which includes design assessment.</p> <p>All major proposals submitted as planning applications are assessed as part of the development management process which includes statutory and Council consultees including the Conservation and Design Team and where applicable Historic England and undergo further scrutiny at planning committee by Lambeth Councillors.</p>
R37	6	"Use materials that positively respond to Lambeth's local distinctiveness in order to integrate the building with its immediate and wider context" who decides what is 'positive'? Again, could examples be given by way of illustration as happens in Part 4.	Y	<p>Accepted. Include cross-reference to part 1</p> <p>Para 3.55 <i>Use materials that positively respond to Lambeth's local distinctiveness in order to integrate the building with its immediate and wider context. Please refer to Part 1 of this SPD for further guidance.</i></p>
R25 GLA	18	Policy Q26 of the Lambeth Local Plan has followed the requirements of LP2021 by	N	The SPD provide guidance to assist with the implementation of Policy Q26. It does not introduce additional policy requirements. Para 3.55 is

		<p>setting a specific, numeric definition for what constitutes a tall building in the borough (2 parts), identifying locations appropriate for tall buildings on maps (Annex 10) as well as setting appropriate heights for these locations. The policy also makes clear that outside of these identified areas there is no presumption in favour of tall building schemes.</p> <p>There is some concern that the additional guidance on tall buildings within the draft document undermines the clarity of your DPD by introducing further criteria by which tall building applications outside of identified locations should be assessed against.</p>		clearly entitled 'Design Guidance' and does not conflict with the policy objectives.
R33	5a	<p>Also suggest that the guidance proposes efforts are made to address the often sterile space directly around a tall building, one of the frequent problems of tall buildings (e.g. Swiss Re, Capital Tower in Waterloo, Blackfriars tower). This can be resolved by placing active uses at ground floor (as in the new Waterloo Rd planning application) or with the use of seating and planting which encourages lingering</p>	N	<p>Not accepted. The tall building guidance should not be read in isolation. Part 2 of the design guide provides guidance on inclusive environments, public realm and open spaces for all development including tall buildings. Specific to Part 3 Tall Buildings guidance for public realm included at para 3.55, 3.59, 3.64 and 3.65. The content is considered sufficient.</p>
R24 Brixton Society	11	<p>Examples (following para 3.56) Although some attempt has been made to show examples of both good and bad practice, this has not been entirely successful. In particular, none of the examples on the lower row of page 22 are</p>	N	<p>Noted. Not accepted. The illustrations are deemed acceptable.</p>

		<p>acceptable as “best practice” and should instead be marked with a cross rather than a tick.</p> <p>It must be emphasised that variations in facing materials do not redeem buildings which are of excessive scale and poorly composed.</p>		
R21 Historic England	6	<p>Equally the consideration Q26 places upon the WWHS is not reflected in the tall buildings' principles section of Part 3 (page 20) - although this is picked up at 3.58 it would be helpful to include it as a bullet point in the list of guidance principles on page 20 in the interest of clarity and consistency.</p>	Y	<p><i>Para 3.55 point 2 add:</i></p> <p><u><i>Preserve the settings of heritage assets (including the Westminster World Heritage Site where relevant)</i></u></p>
R21 Historic England	7	<p>We welcome paragraph 3.56 which makes appropriate links back to the tall buildings evidence and assessments that were used to support the local plan.</p>	N	Noted
R38	5	<p>Finally, I want to state that I find the discussion on the impact of a tall building in near, medium and distance views reveals a certain snobbery about the precious nature of our historic heritage compared to bog-standard townscapes.</p> <p>I agree with the statement in 3.55 that designers should take particular care to ensure that the building massing and form are successful in each context (ie, from all views). But I do not think that we should concern ourselves purely with sensitive</p>	Y	<p>Part accepted. Decision makers are required by law to pay ‘special regard’ to the preservation of designated heritage assets and their settings. This high bar ultimately means that there will always be a hierarchy of assessment. However, general townscape impacts are important. The tables provided to aid assessment are based on established industry best practice.</p> <p>In Table 1 ‘heritage receptor value the text has been amended:</p> <p><i>MEDIUM</i></p>

		<p>receptors by which I understand you to mean historic landmarks.</p> <p>The document says that receptors should include the settings of heritage assets or places of townscape/landscape value. Who decides whether a place has townscape value? I would prefer wording to indicate that tall buildings seem out of place in low-rise townscapes. And maybe existing residents and businesses should have a say on whether a townscape is of value?</p> <p>The document creates a hierarchy of importance attached to the setting of a new tall building, summed up in the tables at the end. Table 2 reveals an appalling design snobbery about commonplace or unremarkable townscapes, giving such places a low receptor value.</p> <p>The people who choose to live in such places would probably place a higher value on them as being human-scale, green and having a friendly and unthreatening feel. The views of residents should be credited with some value in this ranking which seems entirely decided by the values of design and planning professionals who are themselves swayed by fashionable notions of what constitutes attractive architecture and important assets.</p>	<p><i>'Assets on the Local Heritage List and Non Designated Heritage Assets identified through the planning process. Conservation Areas of incoherent quality. <u>Undesignated townscape of coherent quality.</u>'</i></p> <p><u>LOW</u></p> <p><i>'<u>Ordinary</u> streets of housing / development types common in Lambeth (Victorian and inter-war speculative housing, Council estates etc., modern development). Buildings of local interest designated for purely historical or evidential (rather than aesthetic) significance.'</i></p>
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R24 Brixton Society	12	<p>(paras 3.59-3.63)</p> <p>We welcome that the Council has belatedly published some criteria for this important issue.</p> <p>In para 3.59 point 1, the reference to CFD should be explained as computational fluid dynamics, not “compulsory...”</p> <p>In the table following para 3.62, service yards should be included within Category 4, bearing in mind their widespread use by cyclists, delivery drivers and maintenance staff, even if not used by the public in general. A specific hazard is waste materials or lightweight panels being blown around, particularly if building repairs are underway.</p>	Y	<p>Accepted. We have corrected typo error in para 3.59 point 1. <i>‘Undertake Early Stage Massing Optimisation: Wind Tunnel Testing OR Computational (Compulsory) Computational Fluid Dynamics (CFDs) simulations....’</i></p> <p>Specific reference to service yards is not considered necessary.</p>
R13 Optivo	26	<p>- Page 24 – paragraph 3.59 – point 1 – whilst we are supportive of the approach, the wording of the final sentence of point 1 may need re-wording to ensure the aim is clear.</p>	N	<p>Assessments of this nature are highly technical and undertaken by specialists. Therefore, most applicants / designers won’t need to consider the matter in detail. For that reason we are comfortable with the existing technical wording as it will make sense to those undertaking the assessments.</p>
R34 Lambeth Village	7	<p><i>‘Public Realm 3.64 Ensure the associated public realm is adequate for the volume of users and mix of uses but avoid stark contrasts between height and open space.’</i></p> <p>There is no definition here of ‘adequate’ or a reference to another document to define it, so it is meaningless.</p>	Y	<p>Accepted. The text has been amended to read:</p> <p><i>‘Public Realm 3.64 Ensure the associated public realm is adequate for the volume of users and mix of uses but avoid stark contrasts between height and open space. <u>Ensure that pedestrian and vehicular access and egress to the building does not cause unacceptable impacts on pedestrian comfort / safety of the adjoining footways and public realm</u>’</i></p>

R38	1	I do agree with 3.67, though, that tall building development should seek to blend into its context rather than stand out.	N	Noted
R20 EcoWorld	6	<p>We consider there is an inconsistency in respect of the delivery of tall buildings, where the guidance suggests that tall buildings should “<i>blend into their context rather than stand out</i>” (para 3.67). We do not consider that this wording is necessary, given the remainder of the draft SPD successfully balances the expectation that new development should respond positively to local character and distinctiveness (para 1.27) with design-led optimisation (London Plan Policy D3). It is also not achievable as buildings that are taller than their surroundings will necessarily stand out. It is therefore important that they are of high architectural quality and respond to the local character and context in style if not form.</p> <p>The suggestion that any development should blend in misses an opportunity to deliver exemplary, innovative design which could contribute to the evolution of the Borough, which is described at the outset of the draft SPD as a key characteristic of its character and appearance over time: “<i>Successful context driven change has enhanced neighbourhoods and enriched or reinforced local character.</i>” (para 1.27).</p>	N	Not accepted. The use of ‘generally’ in the text allows for exceptions. Applicants can also use the ‘comply or justify approach if they consider they have good reason not to follow the SPD guidance

		<p>The draft SPD should be ambitious in terms of new design, reassured by its requirement throughout that any new development must respond positively to local context and distinctiveness. Para 130 Part c) of the 2021 NPPF describes how planning policies and decisions should ensure that developments <i>“are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);”</i>. Similarly, Lambeth Local Plan Policy Q5 (Local Distinctiveness) describes at Part C: <i>“Where development proposals deviate from locally distinct development patterns, applicants will be required to show in their design/heritage statements that: ii. the proposal clearly delivers design excellence; and will make a positive contribution to its local and historic context.”</i></p> <p>EWL is currently preparing a planning application for Knollys Yard, located to the south of the Borough. Knollys Yard is a unique site in that it is currently an island, separated from the surrounding residential context by three railway lines, substantial railway sidings and a level change of up to 10m from adjacent residential streets. At its closest the site is 30m from its nearest neighbour, rising to 90m. As a unique proposition, it follows that a suitably</p>		
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		<p>bespoke response should be pursued to ensure design-led optimisation is achieved.</p> <p>The physical and visual separation from its immediate surroundings presents an opportunity to deliver an exemplary development which can create its own context whilst responding positively to the local character.</p> <p>Alongside the delivery of substantial numbers of new, including affordable, homes, redeveloping the site allows for the reinstatement of a historic route across the site, knitting the neighbourhoods of West Norwood and Tulse Hill together, enhancing biodiversity and ecology, and delivering meaningful public realm and open spaces for both the existing and future community to engage with.</p> <p>This is achievable by pursuing design-led optimisation which seeks to integrate a long-isolated site through exemplary design which looks to create a new context, and could not be achieved by seeking to blend in.</p> <p>The SPD should not set a less ambitious bar than adopted local, regional and national policy. It should instead recognise that new development can positively evolve local context, character and appearance,</p>		
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		reassured by the comprehensive design policies within the adopted Local Plan which set an appropriately high bar. As such, we would recommend that para. 3.67 in the draft SPD is removed.		
R20 EcoWorld	8	Remove paragraph 3.67. This paragraph is unnecessary and inconsistent with the Development Plan, the quality of design and site specific response being secured by the remainder of the SPD and relevant adopted planning policies.	N	Not accepted. The use of 'generally' in the text allows for exceptions. Applicants can also use the 'comply or justify approach if they consider they have good reason not to follow the SPD guidance
R36	1	Is the amount of facilities management and security that tall buildings require sustainable, particularly if they are to be used to provide social housing? Do they depend for sustainability upon a relatively high proportion of private ownership to subsidise facilities management and security costs? If so, might such prospective purchasers be either off-plan speculators who would do nothing for the community, or be unable to afford the properties? Is there enough sewer capacity for more tall buildings? Could Lambeth together with other Thames-facing local authorities take their own view on sewer capacity on the basis of frequency of storm overflow tank discharges into the river? Such discharges are supposed to be very rare, and it is not clear that Ofwat and the water companies can be trusted to advise on sewer capacity.	N	No change. These matters go beyond the scope of this design guidance.

		I am thinking, for example, of the Vauxhall/Bondway area, which seems already to be surrounded by tall buildings in Lambeth and Wandsworth.		
R15	67	Non-residential development (para 3.68) Disabled access should be mentioned and disabled parking or drop off. And have external letter boxes and signage with street number.	Y	Disabled parking and drop off, letter boxes, signage and street numbering is already referenced in part 2. Accepted will we have added reference to Inclusive Environments to non-residential development text highlight importance. <i>3.68 Along with the usual design considerations designers of new schools, places of worship and community facilities should consider the 'Child Friendly Lambeth' and <u>'Inclusive Environments' advice contained in Part 2 and</u></i>
R53 Ward member	20	3.68 In the case of community buildings it is surely even more imperative that there is widespread community consultation, if not community co-production as per the Council's co-production policy position?	N	The Council's co-production policy relates to its own buildings and is separate from Planning policy. Part 1 of the SPD paragraph 1.69 already encourages community engagement at the design stage and further reference here is not considered necessary.
R15	68	Offices (para 3.71) Ground floor window not obscured contradicts all windows obscured to 80cm.. No mention of designing offices to support future residential use – permitted development	Y	Accepted we amended text to clarify. <i>5. <u>On upper floors</u> Frit or obscure any floor to ceiling windows approximately 800mm from the floor</i> Accepted we have added point to ensure new office developments are adaptable. <i><u>New office developments should be designed for adaptability to lengthen building's lifespan by making it possible to adapt the space without structural alteration</u></i>

R51	10	<p>Additional points required Para 3.71</p> <p><u>8. Provide policy compliant levels of accessible, convenient and secure cycle parking for employees and visitors.</u></p> <p><u>9. Provide adequate changing, locker and changing facilities</u></p>	Y	Accepted. Bullet points 8 and 9 added to Para 3.71 as proposed.
R13 Optivo	27	<p>- Page 32 – paragraph 3.71 – given the relatively recent changes to the use classes order (Class E), a general point aiming to ensure designers consider the future use (adaptability) of a building may be beneficial e.g. design for adaptable buildings that can be used for multiple purposes with little alteration.</p>	Y	<p>Accepted. Additional text has been added to the start of para. 3.16</p> <p>3.16 Designers should design building structures and interiors with easy future adaptability in mind Designers-It should <u>be remembered</u> 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.</p>
R53 Ward Member	21	<p>3.71 an additional criteria should be good internal daylight – as illustrated on pg 33 – for both mental/physical health and to help achieve net-zero</p>	Y	<p>Accepted. Added new point 5.</p> <p><u>Optimise daylight provision for working environments, minimising glare through selection of appropriate shading.</u></p>

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

Respondent no.	Comment no	Comment	Y or N?	Edit
R04 City Planning	4a	 <p>2+ Storey Extensions Policy Q11 Criterion A states that in principle where building alterations and extension have the potential to deliver enlarged and additional residential units, they will be supported in principle. Again, the SPD should reflect this policy support for extensions as they will have a direct influence on meeting housing and small sites targets.</p>	N	Noted. No change. The guidance is written to support the policy and applications are assessed against the policy. Given the above it is not considered necessary to repeat the policy wording in the guidance.
R13 Optivo	32	- Page 26 – specific reference to the 25 degree and 45 degree rule and/or cross reference to page 12 of Part 2 may help some users of the document.	Y	Accepted. We have included cross reference to Part 2 in the introduction. <i>4.3 <u>When assessing applications the Council will have regard to Building Research Establishment (BRE) 'Site Layout Planning for Daylight and</u></i>

				<i>Sunlight: a guide to good practice' (BRE209 2022). Applicants should be aware of its content. Part 2 of this SPD provides further guidance on daylight and sunlight.</i>
R15	70	Para 4.5 there are several estates with similar rules	N	Noted
R24 Brixton Society	13	Overview and General Advice: In para 4.5, it is worth adding that alterations to leasehold property will generally require the consent of the freeholder.	Y	Accepted. Additional text added to the start of para. 4.6 <i><u>'In most circumstances leaseholders will require the permission of their freeholder before alterations can be undertaken.'</u></i> NB we have also corrected the typos by adding capitals to 'Estate' after Dulwich and Cornwall.

R15	71	Para 4.8 some conversation area rules need updating eg for retrofitting for net zero	N	Noted. The Council has a statutory obligation to pay 'special regard' to the desirability to preserving the special interest of conservation areas. For that reason, best practice from Historic England is referenced throughout this document.
R13 Optivo	28	Part 4 - Page 6 – paragraph 4.12–4.13 – point 3 states that “ <i>façade retention is not considered acceptable in conservation areas under Policy Q22</i> ”, however, paragraph 4.13 goes on to cover façade retention. To avoid confusion, it may be appropriate to change the wording of point 3 so that it more closely aligns with that of Policy Q22 which states “ <i>façade retention....is generally not considered appropriate</i> ”.	Y	Accepted. We have revised text. <i>'4.14 Outside of conservation areas the retention of a building façade and the erection of a new building behind may be desirable in instances where a façade makes a particular contribution to its locality.'</i>
R15	72	Para 4.14 No mention of triple glazing	Y	The wording in para. 4.15 states 'at least double glazed'. Reference has also been added to triple glazing in the retrofit tables elsewhere in this document.
R13 Optivo	29	- Page 9 – we are supportive of the level of detail provided regarding balconies. This section may benefit from reference to the requirements of Policy H6 of the Lambeth Local Plan and D6 of the London Plan 2021 regarding the size of amenity space required.	N	Noted
R24 Brixton Society	14	Balconies & Roof Terraces: Our experience is that most proposals are for roof terraces or inset balconies to be added to older converted properties,	N	Noted. This is already covered adequately in other sections of the document.

		<p>rather than for the projecting balconies which paragraphs 4.22 to 4.26 appear to focus on.</p> <p>The first consideration in the acceptability of roof terraces and balconies should be the impact on neighbours in respect of overlooking or noise.</p> <p>Roof terraces above existing projecting shopfronts are generally more welcome, as neighbours are less likely to be concerned about overlooking, and background noise levels may be higher from passing traffic. The recent introduction of LTNs has left some such properties on quieter streets than previously.</p> <p>Green roof construction should be promoted as an alternative for flat roofs where regular resident access is not acceptable.</p>		
R15	73	<p>Para 4.27. Render is a common external finish in the borough. See also para 4.70</p>	N	<p>No change.</p> <p>Whilst it is accepted that render is common in some parts of the borough, para 4.30 already explains the policy situation to new render under Policy Q5 - render does not weather well in urban environments, and requires regular treatment or redecoration to maintain a smart appearance, placing an unnecessary maintenance burden on property owners.</p> <p>In looking at this response, and to avoid confusion between 4.27 and 4.121 we are proposing to repeat text from 4.27 in 4.121 as follows:</p> <p>4.121 Where it is proposed, designers should take care to ensure that the design integrity of the</p>

				<p>building is retained and or improved. To protect the visual amenity of streets, <u>existing façade treatments to streets and open spaces should generally be retained and insulated internally. Side and rear elevations (not street facing) present the best opportunity for external insulation.</u> In most cases <u>Where external insulation is used,</u> 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 <u>their</u> 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 <u>below.</u>'</p>
R24 Brixton Society	18	<p>Conversions: (para 4.32 on) 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. They generally make a positive contribution to the street scene, and we remain receptive to conversion proposals, but we suggest our criteria are better than those listed in para 4.34:</p> <ul style="list-style-type: none"> • 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. 	N	<p>No change.</p> <p>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. Para 4.33 provides specific cross reference to Part 2.</p>

		<ul style="list-style-type: none"> Provision of external amenity space for each dwelling should be encouraged. Any balconies or roof terraces should respect neighbours' privacy and conform to paras 4.22-4.26 above. Communal gardens will be acceptable. <p>The SPD does not address the issues of de-conversion or reconfiguration of earlier conversions. We will be receptive to cases where existing layouts are sub-standard, or poorly-arranged, or where family-sized units lack access to external amenity space.</p>		
R15	69	<p>Conversions (para 4.3)</p> <p>Good to mention cycle storage and space for rubbish bins</p>	N	Noted
R15	74	<p>Para 4.34 bullet 5 What does flexible layouts mean – maybe an example would help</p>	Y	<p>Accepted. We have added reference to building regulations M4(2) which supersedes Lifetime Home standard Category 2</p> <p><i>'• Consider the future needs of users particularly for the aging population by ensuring flexibility and adaptability of internal layouts. <u>Examples of adaptable and flexible dwelling layouts can be found in Part M4(2) of the building regulations.</u>'</i></p>
R51	11	<p>Additional bullet to para 4.34:</p> <ul style="list-style-type: none"> <u>Provide policy compliant levels of cycle parking. Policy Q13 B provides specific guidance on the provision of cycle storage for small-scale flat conversions.</u> 	Y	Accepted. Bullet point added to para 4.35 as proposed.
R25 GLA	21	<p>Providing design guidance on the conversion to residential of different land uses is welcome. However, the specific guidance is very brief and does not include key forms of conversion,</p>		<p>Noted</p> <p>The conversion of integral garages is so straightforward that guidance is not considered necessary. In most circumstances the conversion</p>

		Lambeth should be supporting through its design guidance, such as conversion of residential garages. The conversions of this land use are supported by London Plan Policy H2 Small Sites and is a likely source of housing supply within the borough. Thus, the design guidance should provide guidance to support such forms of conversions and ensure they are designed well.	N	of domestic garages is unacceptable due to their small size not being suitable for residential accommodation. Given the above guidance on the conversion of domestic garages is not considered necessary.
R37	7	We think the document is well put together, not only with the illustrations and examples of acceptable (tick) and unacceptable (x), but with some very sound advice and advisory precautions included. one typo item 4.34 where not relay on should read not rely on.	Y	The typographical errors have been corrected.
R13 Optivo	30	- Pages 17-24 – the main headings and sub headings within this section make multiple references to rear elevations, rear extensions and returns. Switching between the terms could be confusing for some users of the guidance. It may be beneficial to simplify by retaining the “Rear Elevations” heading on page 17 and removing the headings from pages 19 and 20, as these pages already include suitable subheadings.	Y	The titles are relevant to the text and there are subtle differences in each. The confusion arrives from a formatting error. The subheading ‘ Rear extensions — Closet Returns’ has been corrected to be a main heading. The subsequent Main Heading has also been corrected to read ‘Rear extensions — Returns’
R13 Optivo	31	- Page 19 – Heading – States “Rear Externsions” rather than Rear Extensions”.	Y	Accepted. We have corrected typographical error. It now reads: ‘Rear extensions — Returns’
R15	76	Rear Elevations Are “close additions” also known as “back additions”? The 15% permitted development rules may contradict this guidance	N	No change. The guidance has been written for those circumstances where planning permission is required. It does not override permitted development rights where they exist.
R24 Brixton Society	19	Extensions: (paras 4.45-4.73)		Noted.

		<p>In this sub-section, there remains some confusion over the terminology, though the use of “return” rather than “addition” for a rear wing is an improvement.</p> <p>However, para 4.48 is historically incorrect in asserting that properties with semi-basements did not have rear returns. It would be more accurate to say that examples from the mid-1860s onwards tended to have just one room per storey in the rear wing, whereas from the 1870s onwards, houses without a semi-basement often added a bathroom or box-room to each storey.</p> <p>Even from 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 or five rooms deep on a narrow frontage.</p> <p>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. (Paras 4.37, 4.50 and Fig.4 refer).</p>	N	<p>No change. The historical background offered is not considered necessary for a document on design guidance.</p> <p>The level of detail in the current text is considered sufficient.</p>
R24 Brixton Society	20	<p>For full-width rear extensions (paras 4.57-4.59) the main consideration is to maintain adequate daylight into the rear of the original building. This can be achieved by roof windows, or lantern lights for flat roofs, strangely absent from Fig.7. For older terrace houses with deep plans, retaining a small light-well behind the main rear wall of the house is an acceptable solution.</p>	Y	<p>Noted. The guidance does not discourage rooflights on extensions. We have amended figure 7 to illustrate rooflights.</p> <p>An additional paragraph has been added after 4.58 which reads:</p>

		The stepped rear wall in Fig.7 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 functional rather than “designed” arrangements.		<i><u>‘To maintain adequate daylight into the rear roof of the host building roof windows or lantern lights should be considered.’</u></i>
R24 Brixton Society	21	Glazed Extensions and Bays (para 4.60) We are concerned that the SPD still offers no guidance on bay windows . Early 19 th 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, but occasionally on the flank wall of a rear wing. New or replacement bays should normally be appropriate to the style of the original house, though more latitude should be allowed at the rear.	N	No change. The existing text is para 4.17 includes the following bullet: <i>7. Retain bay windows and other feature windows such as oriels.</i>
R24 Brixton Society	22	Side Extensions (paras 4.63-4.66) The underlying policy remains 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. Visually, the lower example in Fig.8 is preferable to the upper picture, where the flank wall directly above the centre of the ground floor window adds needless structural complexity. More creative solutions with the roof angled back from the boundary may also be acceptable.	N	Noted. The guidance can’t contradict the adopted policy position. The current advice aligns with Policy Q11 in the adopted Local Plan 2021.

R4 City Planning	4B	<p>It would be helpful to have case study examples or drawings to illustrate what would be acceptable. The scheme above a 397 Clapham Road proposed a four storey rear return (including lower basement). The scheme was allowed because the storey was below the ridge line of the building by at least half a storey. 397 Clapham Road is also within a conservation area so it is a good example of extensions granted in designated area. It is also worth noting that by allowing extensions such as the ones at 397 Clapham Road, they create flat roofs where terraces can be added. Therefore promoting 2+ storey extensions and roof terraces can make a meaningful contribution towards the borough's housing targets.</p>	N	<p>Noted. No change.</p> <p>The example referred to at 397 Clapham Road was something of a one-off and a number of site specific considerations influenced the outcome. Whilst an acceptable outcome it is not considered an example that might be applied in many circumstances.</p> <p>The numerous 3D illustrations within Part 4 of this guidance show how common building types in Lambeth can be extended sympathetically. These 3D examples will directly applicable to conversion schemes where extensions are also proposed.</p> <p>Given the above it is considered no additional illustration is necessary.</p>
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R13 Optivo	33	- Page 30 – paragraph 4.74 – this paragraph focuses on solar PV. The roofscape is relevant for all types of alteration. It may therefore be beneficial to include the first two sentences from this paragraph as a separate sub-heading later in this section.	Y	Agreed. The first two sentences have been moved to para 4.144.
R24 Brixton Society	23	Chimneys etc: In para 4.81, in most cases it should 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 provide useful buttressing for stability of the party walls.	N	Not accepted. The loss of chimneys generally has an adverse impact on roofscape as illustrated on page 31.
R15	75	Rooflights Is fig 9 & 10 saying rooflights have to be same size & aligned . Is avoiding roof escape in line with fire safety advice?	N	No change. In most circumstances an internal fire protected route (with fire doors) from the loft room to an outside door is adequate for the purposes of the building regulations.
R24 Brixton Society	25	Roof Alterations – Existing Dormers: (para 4.87) The replacement of original dormers by simple roof windows should be discouraged – reinstatement of original features is preferred.	N	No change, para 4.87 already includes the following: <i>Where dormers are an integral part of the character of a building their loss or unsympathetic alteration will generally be resisted.</i>
R24 Brixton Society	26	New Dormers (paras. 4.88-4.96)	N	Noted.

		<p>At the front, the upper storey of a typical Victorian terrace often has a large window or bay, together with a smaller window directly above the front door.</p> <p>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. Alternatively, a wider central dormer, as case D in Fig.11, would be acceptable in most cases. Both these solutions allow the dormers to be kept clear of party wall parapets and flashings.</p>	N	The subsequent guidance on mansard roofs adequately addresses this 'new attic storey' dormer scenario.
R24 Brixton Society	27	For dormer window heads, a height of 2.1m above floor level should be treated as a minimum for new dormers, and the room ceiling should be higher where possible. This is to avoid creating mean and sub-standard accommodation with poor ventilation.	Y	<p>Bullet 2 of para 4.90 has been amended to read:</p> <p>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 at <u>minimum</u> 2.1m above floor level.</p>
R24 Brixton Society	28	In the street context, the height above the front parapet is more critical. This should always be sufficient to allow for rescue by the fire brigade. Visually, two-thirds of the height of the windows of the storey below would be acceptable.	N	Noted. This level of detail is not considered necessary. Means of escape is covered by the Building Regulations.
R24 Brixton Society	24	In para 4.100 point 7, we deplore the excessive raising of chimney stacks above the roofline. Stacks should only be raised sufficiently to clear the party wall parapet, unless a case can be	N	No change. The upward extension of chimneys on mansard extensions is considered key to their integration into historic roofscapes.

		made for matching adjacent heritage assets, or to ensure efficient operation of an active heating installation.		
R5	1	<p>Mansard additions are allowed as per page 43, and rear returns are allowed as per page 14.</p> <p>What is unclear and could be clarified is if mansard and rear return can together be joined. I believe this would help alleviate space and housing issues.</p> <p>The rear return additional story alongside the mansard would remain subordinate.</p>	N	<p>No change. This matter is already covered by Figure 14 which shows L shaped dormer illustrations which show roof extensions on rear returns coupled with mansard roofs.</p>
R37	8	<p>Page 45 illustration 4 (first bottom row) looks strange and we believe this should get a X</p>	N	<p>Not accepted. The illustration shows an contemporary 'take' on a traditional dormer which has been approved within Lambeth.</p>
R39	1	<p>The plan appears to reject (mostly by not mentioning them) any roof extension that is not a mansard or L-shaped dormer. This creates a challenge for all the buildings in which neither options are desirable (there can be a range of reasons, from the general construction of the house, or the fact that other extensions have been performed on adjoining roofs such that a mansard or dormer would jarr locally, or the levels of internal floors are not compatible with a mansard, or the way a house may have been divided into flat, dividing the roof between properties). To some extend, such a challenge is illustrated in the photographs used for the section on "Additions to larger buildings", where there are two examples where a mansard was not installed. Obviously, these buildings are so different from the more usual converted houses seen in Lambeth, that it seems evident that a mansard would not have been appropriate.</p>	N	<p>The guidance supports policy in the Lambeth Local Plan.</p> <p>Neither the policy nor the guidance seeks to resist non-standard designs in non-standard buildings</p> <p>To ensure the guidance is useful to the greatest number, emphasis has been placed on the most common scenarios faced in Lambeth.</p> <p>The illustrations provided on pages 46 and 47 are considered to show a sufficient range of options.</p>


		<p>Nevertheless, the regrettable implication from this omission is that extensions will be resisted in the many cases where roof and house shapes do not lend themselves to neither mansards nor L-shaped dormer (and for which a simple dormer would not provide a suitable indoor space).</p> <p>Whilst it is of course not possible to speculate on all the possible solutions that flat owners and architects may propose in such cases, it would be encouraging if a sub-section could be added to illustrate a few acceptable roof extensions of alternative designs.</p>		
R48	1	<p>The Design Guide is silent on non standard roof extensions, specifically flat roof extensions for additional accommodation.</p> <p>There is Lambeth Local Plan policy Q11 wording about this but no design guidance here.</p> <p>Within the policy wording it is detailed as possible to build a roof extension providing additional accommodation as detailed in Q11 L. 'Other types of additional accommodation on roofs will normally only be acceptable on non-standard roof types where they comply with (a) (i) and (b).' Therefore a proposal that positively responds to the original architecture and is subordinate would be acceptable and be in compliance with Q11 K.</p>	N	<p>Neither the policy nor the guidance seeks to resist non-standard designs in non-standard buildings.</p> <p>However, by their very nature non-standard solutions require bespoke designs and it is very difficult to pen guidance in such circumstances.</p> <p>To ensure the guidance is useful to the greatest number, emphasis has been placed on the most common scenarios faced in Lambeth.</p> <p>The illustrations provided on pages 46 and 47 are considered to show a sufficient range of options.</p>
R48	2	<p>In practice such designs for flat roof houses in terraces or other groupings are rejected at planning on the grounds that proposals would be an additional storey on a flat roof building, say in a terrace, yet the planning guidance makes such a proposal possible via the wording of the policy as stated above.</p> <p>Guidance from Lambeth along with diagrams as to how flat roof extensions providing additional accommodation would be</p>	Y	<p>The majority of flat roofed terraced properties in Lambeth date from the post-war period (post 1948). Such buildings already benefit from permitted development rights for upward extension. The following text is proposed after para. 4.107:</p> <p><u>'Post-war properties</u></p>

		achievable and acceptable, like for other types of roof alterations and extensions in the Design Guide, would be beneficial to designers.		<i>The upward extension of post-war properties (particularly those in groups and terraces), is often best achieved by closely replicating the architectural detailing and forms of the existing upper floors and replicating the roof form. Party walls of upward extensions should generally be treated in the same external materials as the host building'</i>
R15	77	Roof Extensions section Living roofs seem to be in wrong place Para 4.114 & 4.115 seem to be under wrong heading What is difference of blue/green /brown roof (para 4.116) Presumably developments supporting biodiversity are favoured	Y	Accepted. We have amended text. Para 4.118 ' Blue / green / brown roofs..... <u>A blue roof is a flat roof design that is explicitly intended to temporarily store rainfall. A green roof is a vegetated roofing system which is functionally integrated onto a roof area. A brown roof is where the substrate surface is left to self-vegetate from windblown and bird lime seed dispersal.....'</u> Policy EN1 of the Lambeth Local Plan seeks to protect and enhance local biodiversity.
R25 GLA	22	Pg49 (para 4.117) Could mention retrofitting in this section	Y	Accepted. The retrofitting guidance within Part 3 has been moved to Part 4.
R15	78	Sustainability (para 4.117) An important section where residents, developers & builders will look for guidance	Y	Accepted.

		Any Lambeth tailored guidance eg do we want to see heat pumps covered over		<p>We have moved the retrofit tables on pages 11 and 12 from Part 2 of the document into Part 4 where they belong in the Building Alterations, Extensions and Retrofit advice. This should provide greater clarity for users. The table has been added after 4.146 with the following introductory text:</p> <p><u><i>'The tables on show the wide range of retrofit options and explain the likely planning consent requirements.'</i></u></p> <p>General policy and guidance on plan and equipment is considered relevant and no specific guidance considered necessary.</p>
R53 Ward Member	14	Part 4 should reference consideration of embodied energy of construction materials and the prioritizing of materials which capture carbon, such as CLT.	Y	<p>Accepted. New para 4.28 <u><i>Designers are encouraged to consider the environmental credentials of construction materials and seek to use the most sustainable possible.</i></u></p>
R5	2	<p>The type of claddings to the rear of a property to cover external insulation could be clarified. Non-render rain shield systems allow greater access and maintenance. What rain shield material is acceptable for residential?</p> <p>I would hope timber to lower the embodied carbon of the building.</p>	N	<p>Para 4.118 of the guidance does not discourage the use of cladding systems. Timber is not encouraged as it is generally not supported under Policy Q5 as it is not locally distinct and presents a maintenance burden. Additionally, the fire spread risks of timber cladding are also a reason to endorse its use.</p> <p>Should timber be proposed it is best assessed on a case-by-case basis where applicants may choose to use the 'comply or justify' approach.</p>

				Can e change the caption on the bottom left image of page 50 to read: <u>'after external insulation pitched roof extended over insulation layer'</u>
R15	79	Built fabric para 4.118 Please explain fabric first approach to retrofit. Does it mean prioritising repairs, insulation, draught proofing & ventilation before considering external insulation.	Y	Accepted. We have moved the retrofit tables in Part 2 of the Design Guide to Part 4 where it is more relevant. By introduction to those tables, we have added the following text for fabric first approach. <u>'4.120 The council supports a fabric first / whole house approach to retrofit, and fabric should be sufficiently energy efficient to support the installation of a low carbon heating system. This approach means prioritising building repairs, insulation, draft proofing and ventilation as the first stage of the retrofit journey.'</u>
R39	2	The final section on Sustainability (pages 49 to 54) is much improved, which is a welcome indication of the council's vision. However, it does sometimes appear as if the rest of the document had been written without much concern for this vision. The Sustainability section does insist on "the effectiveness of the building envelope in providing a suitable indoor environment". Often a mansard roof is not optimising the indoor space, because of the roof pitches. In addition, most mansard include a flat roof section, and flat roofs are known to present a number of challenges in construction and maintenance over pitched roofs. Where an alteration to the roof pitch could provide high quality internal space without forming a mansard, and provided this alteration does not	N	The guidance seeks to strike a balance between achieving sensitive extensions which are in harmony with the character of the borough and allowing property owners to optimise their accommodation. The traditional mansard approach advocated in figures 14 and 15 of the draft document is considered optimal and is certainly preferable to box-like additions which are rarely acceptable.

		<p>disconnect that roof from that of the neighbouring houses, should this not be encouraged?</p> <p>A policy that supports roof alterations in line with the local roofscape yet does not impose roof shapes that may compromise the quality of the internal space would appear more progressive.</p>		
R15	80	<p>Para 4.127 cavity wall insulation is not possible in solid walls.</p>	N	<p>No change.</p> <p>Para 4.127 states '<i>Cavity wall insulation is strongly recommended for those buildings with cavity wall construction.</i>'</p>
R5	3	<p>An air source heat pump ASHP requires a setback distance of 1meter to the roof edge. What could be made clearer is which edge.</p> <p>Is this any edge without a distance from a boundary or any of the edges of the roof?</p> <p>Would a further distance from a roof edge but to the boundary suffice?</p> <p>For example, could ASHP to be located on top of rear extensions close to the rear yard? (see the attached image where placement where the planter is.)</p> <p>With the expected increase in ASHP installations, making sure clear guidelines regarding placement in terms of roof edges when not also a boundary edge will enable a greater uptake in London.</p>	Y	<p>The design guidance in para 4.136 makes no specific reference to 1m set back but links to guidance from Historic England. General guidance on how to integrate plant in Part 2 is considered relevant.</p> <p>The technical performance requirements of the unit will be the primary consideration in these circumstances.</p> <p>On page 53 can we change the caption to read:</p> <p>'In prominent locations screening may be required <i>Visually intrusive locations should be avoided.</i></p>

				
R15	81	Para 4.140 Govt requires energy suppliers to provides smart meters by end of 2025	Y	Accepted. Additional text: <i>4.140 'Smart energy and water metering should be considered to allow occupants to monitor their own consumption of energy and water. <u>Under industry rules set by energy regulator Ofgem, energy suppliers are required to 'take all reasonable steps' to ensure that a smart meter is installed before 30 June 2025.'</u></i>
R15	82	Para 4.141 Many homes are restricted from using clothes lines. Can this guidance possibly support external clothes lines?	N	No change. Paragraph currently makes reference to drying clothes outside.
R21 Historic England	8	Part 4 - We are pleased to see that the SPD stresses the importance of maintenance and provides links to helpful resources for readers. We are also pleased to see that the SPD addresses retrofit. However, the SPD should recognise the risks of maladaptation through inappropriate or poorly carried out retrofit measures to prevent further issues arising. The unintended consequences of maladaptation include: -harm to heritage significance - loss of features and irreversible harm;	Y	Accepted. The following text has been added at the end of the sustainability section – (after 4.145) <u>'Risks of Poorly Considered Retro-fit</u> <i>Poorly carried out retrofit measures can lead to unintended adverse consequences including:</i>

		<p>-harm to human health and building fabric: poor indoor air quality, condensation and mould growth, decay of building fabric;</p> <p>-failure to achieve the predicted savings or reductions in environmental impact, or even making properties less efficient;</p> <p>-exacerbating fuel poverty.</p>		<ul style="list-style-type: none"> • <i>harm to heritage / architectural significance through the thoughtless removal or obscuring of features;</i> • <i>harm to human health due through mould from condensation due to poor ventilation. This can lead to building fabric decay;</i> • <i>damage to the building fabric through poor installation'</i>
R54	2	<p>Section 3, page 11, implies that all retrofitting of E.W.I. is likely to require planning permission, which, in our view, is not forward thinking enough- please refer to ACAN Climate Emergency Conservation Area Toolkit, nor does it exactly align with national guidance: the planning portal guidance is 'Planning Permission is not normally required for fitting insulation (where there is no change in external appearance) However, if the building is listed or in a conservation area you should consult your local planning authority'.</p>	Y	<p>Accepted. We have revised key to table on 'Likelihood of Planning Permission for green retrofit' now relocated to Pg. 50 of Part 4:</p> <p>May be acceptable but PP or LBC likely to <u>may</u> be required. On listed buildings acceptability will be assessed on a case by case basis against the effect on the significance of the building.</p> <p>** ** Acceptable where complies with government conditions</p> <p>Part 4 of the SPD updated to include hyperlink reference to the ACAN Climate Emergency Conservation Area Toolkit on Pg. 3</p>
R15	84	<p>Para 4.146 why does the council continue to approve crossovers?</p>	N	<p>No change.</p> <p>The regulations around cross overs mean that if an application meets the tests it must be approved.</p>

R51	12	<p>Additional points below:</p> <p>Gardens</p> <p>4.147 <u>Lambeth's Kerbside Strategy seeks to reduce the number and impact of vehicular crossovers to ensure footways are safe from conflicting movements. Proposals for new vehicular crossovers to access off-street parking are unlikely to be acceptable.</u></p> <p>4.148 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 on-street parking bays removes parked cars from the road and the resulting open carriageway allows motorists to drive faster which presents a threat to other road users, especially pedestrians and cyclists.</p> <p>4.149 <u>Car parking in front gardens is unlikely to be supported unless the resident is a Blue Badge Holder and an on-street Disabled Bay cannot be provided within 50m. Any proposed off-street accessible parking must meet the Council's minimum standards and can be accessed without risk to highway or pedestrian safety.</u> Blue badge parking bays in front gardens must meet the Council's minimum standards and can be accessed without risk to highway or pedestrian safety.</p> <p>4.150 Consideration should always be given to securing natural drainage by using permeable paving and soak-aways, maintaining a sense of enclosure through the use of appropriate boundaries, gates, and soft landscaping. The use of appropriate traditional surfaces such as natural stone slabs or granite setts is strongly encouraged in conservation areas. The texture and colour of any new materials should be sympathetic to the setting of the building and wider street scene. Loose gravel will</p>	Y	Accepted. Guidance amended as proposed.
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		be resisted as it tends to drift out onto the footway, becoming a hazard to pedestrians and blocking gutters.		
R15	85	Para 4.149 planning permission is not required for garden sheds.	N	No change. The guidance is written for those circumstances where planning permission is required for garden structures.
R21 Historic England	9	<p>The retrofit sections in Part 4 should highlight the importance of using the wholehouse approach when considering changes to historic buildings. A fabric first approach works for new builds, but this does not work as effectively for historic buildings. A whole house approach means considering all elements including the building fabric, how the building is heated and cooled, and how people use the building, together with the context of the building. It is important to consider the sustainability of construction materials as well as their interaction with the existing building fabric to avoid unintended consequences such as overheating and damp as altering one element of a building can have drastic impacts on the whole building.</p> <p>The following links might be helpful: Listed Building Consent Historic England Advice Note 16 https://historicengland.org.uk/imagesbooks/publications/listed-building-consent-advicenote-16/</p>	Y	Accepted. In addition we have added the additional links where they do not already appear in the document

		<p>Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency https://historicengland.org.uk/imagesbooks/publications/eehb-how-to-improveenergyefficiency/</p> <p>Energy Efficiency and Traditional Homes https://historicengland.org.uk/images-books/publications/energy-efficiency-and-traditionalhomes-advice-note-14/</p> <p>Heritage Counts2019 - There's No Place Like Old Homes: Re-Use and Recycle to Reduce Carbon https://historicengland.org.uk/content/heritage-counts/publications/2019/hc2019-re-use-recycle-to-reduce-carbon/</p> <p>Historic England's Practical Guidance on Energy Efficiency https://historicengland.org.uk/advice/your-home/saving-energy/guidance/</p> <p>2020 - Know Your Home, Know Your Carbon web pages https://historicengland.org.uk/research/heritage-counts/2020-know-your-carbon/</p>		
R24 Brixton Society	15	<p>1.3 Gardens and out-buildings (paras. 4.144-4.150) It is an anomaly that this sub-section has been placed under "Roof Extensions" in the Contents list. It would be more logical to place it after "External Materials" under the Alterations, Extensions and Retrofit sub-section.</p>	Y	The formatting error has been corrected. On page 54 a Section heading has been created for the 'gardens' section to mimic the section heading on page 40.
R15	83	<p>Gardens</p> <p>No mention of preferred hedging plants eg max height</p>	N	No change. This level of detail is not considered necessary. The planning regulations do not cover hedge heights.

R24 Brixton Society	16	<p>In para 4.150, some indication of acceptable heights for front garden structures would be helpful.</p> <p>Currently, there is a proliferation of cycle stores being placed in front gardens, but the SPD provides no guidance.</p> <p>It is clearly impractical for such structures to be sited 1m from the boundaries of a small front garden. We prefer low structures placed against the side boundaries of a front garden.</p>	Y	<p>Para 4.154 has been amended to read:</p> <p>4.154 Garden sheds and other similar tall structures in front gardens (especially small front gardens) will rarely be acceptable due to their adverse impact on visual amenity. <i>Where heritage assets are not impacted structures in conventional, small front gardens should generally not exceed 1.5m in height and should, where possible, be screened by planting. Where structures in front gardens involve heritage assets, they will generally be expected to not exceed 1.1m and should not harm the special interest of the asset (including its setting).</i></p>
R24 Brixton Society	17		Y	<p>Para 4.153 has been corrected to avoid confusion:</p> <p>4.153 The Council wants all residents to be able to enjoy their gardens and optimise their use as private amenity space. It is supportive in principle of development such as sheds, greenhouses, domestic garages, summer houses / home offices in rear gardens. However, structures in gardens need to be carefully considered to ensure that they don't harm visual amenity, lead to the unacceptable loss of garden space or harm the amenity of adjoining neighbours etc. For that reason Policy Q14 seeks to keep such structures <i>in rear gardens</i> 1m back from boundaries to removes the physical bulk away from neighbouring properties and allow adequate space around the</p>

				structure for maintenance of it and the boundary treatment.
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PART 5 DESIGN ADVICE FOR BASEMENTS

Respondent no.	Comment no	Comment	Y or N?	Edit
R13	34	Part 5 - Page 3-33 – we support the comprehensive level of guidance provided regarding basement development. A summary paragraph and/or a checklist of the type of considerations and information required when submitting an application for below ground works, may be helpful.	N	Noted.
R37	9	The previous SPD had one page attributed to Basements and that was mainly focussed on design. The much expanded section (46 pages) as well as design (5 pages) also focusses on the importance of sustainability, the differing geology of Lambeth, neighbour consultation, construction impact and party wall awards. This is to be welcomed.	N	Noted
R37	10	The only comments the society wishes to make relate to section 5.5 which is incomplete,	N	No change. The paragraph has been checked and does not appear to be incomplete.
R37	11	and the fact that the illustrations to the design section are less comprehensive than in the previous SPD and it would be helpful if they could all be included.	N	No change. Given the technical nature of much of the basement content it is not possible to illustrate many of the points. The illustrations provided in the draft are considered sufficient for the purpose of the document.
R15	86	Part 5 Basement Development Para 5.26 Add an item about basements at the bottom of a street slope. If the storm drain are blocked with flash floods its easy for water to spill over pavements into the basements.	N	No change. Policy Q27 requires the provision of a pump. Further advice to this level of detail is not considered necessary.

R24 Brixton Society	29	<p>Open areas and light wells: (paras. 5.44-5.49) The use of open basement areas with railings or balustrades is to be preferred for Victorian or Edwardian properties, as this approach lends itself to the replication of original design features.</p> <p>The photo after para 5.47 on page 12 should be marked with a tick rather than a cross, as this is a reasonably close match to the pattern that would have prevailed on street frontages prior to the loss of most railings to a scrap metal drive during the Second World War. With longer front gardens where the railings are set back further from the pavement, it should be acceptable to have a flat top rail, or even hoop-topped railings.</p> <p>Horizontal grilles are more appropriate where there is little or no forecourt, or pedestrian access is required above the light well.</p>	Y	The illustration has been removed.
R54	3	Section 5, whilst there are clauses on sustainability and mention of the need to consider the embodied carbon of materials, there is no reference to the high carbon load from the creation of basements, removing existing materials, construction methods etc.	Y	<p>Part accepted. We have added additional text to Para 5.81 <i>Policy EN4 seeks to minimise Lambeth's contribution to climate change. Developments are required to promote sustainable design through minimising their CO2 emissions, maximising passive design and reducing the impact of construction through sustainable use of materials. <u>Policy Q27 D vi states that Applicants must consider waste to land fill and carbon emissions of basement development.</u></i></p> <p>Para 5.124 already highlights the impact of basement development. <i>5.124 Basement excavation will produce a volume of spoil and require construction materials (notably concrete, which has a relatively high carbon dioxide emission rating). The excavated material is likely to include made ground and natural soils which will typically be removed</i></p>

				<p><i>from the site by lorry. These materials will typically be disposed of at a suitable landfill site unless measures are taken to treat and re-use elsewhere. As a rough estimate, a basement of 150m³ (for example 10m length by 5m width by 3m depth) would generate in the order of thirty lorry loads, assuming a lorry is carrying one 6m³ skip per load. The environmental “footprint” of a basement project is therefore not trivial.</i></p>
R17 Guys and St. Thomas	5	Paragraph 5.85 of the SPD refers to Basement Impact Assessments, and the concern over the impacts that basements have on other properties. The Trust request that this is expanded to reference sensitive receptor groups within Basement Impact Assessments, specifically healthcare facilities that neighbour proposal sites.	N	The basement impact assessment process would flag sensitive receptors. It is not considered necessary to name individual receptors in this guidance.
R15	87	Para 5.101 what is artificial ground in relation to basements?	Y	Clarification has been inserted at the start of para 5.104: <i>‘Artificial ground is ground that is man-made...’</i>
R15	88	Para 5.103 There are several intermittent springs in West Norwood at a 80m contour	N	Noted.
R15	89	Para 5.144 By nature of a new domestic basement usually no place to store excavated materials (30 skips worth). In a CPZ payment has to be made to suspend parking spaces for a skip - an additional cost for waste.	N	Noted

R15	90	Appendix 8 Provide contacts for Fire Safety advice	Y	In Appendix 8 Lambeth Building Control issues considered column has been updated to include fire safety advice.
R17 Guys and St. Thomas	4	Basement Impact Assessments Part 5 of the SPD focuses on Basements. The care provided by The Trust's sites is highly sensitive to external environmental conditions, including dust, noise, vibration and traffic. Regard should be had to St Thomas' Hospital and other healthcare facilities which are particularly sensitive receptors, and their operation and proper functioning needs to be fully taken into account as part of the consideration of neighbouring development proposals.	N	The basement impact assessment process would flag sensitive receptors. It is not considered necessary to name individual receptors in this guidance.
R49 LERA		Following our various conversations about large scale basements in the Roupell Street Conservation Area, you may be aware that Doug Black took part in a Special General Meeting on 18 May. We were very grateful to him for a really helpful presentation about the new basements policy in the 2021 Lambeth Local Plan, including independent review of Basement Impact Assessments, and answered questions. Sarah Glover, a geotechnical engineer with Arup, also joined us to explain the challenges of ground conditions and construction. The whole event was very informative and enabled a good discussion among residents, who were clearly keen for LERA to explore ways in which the kind of damage and disruption we've seen so far can be managed. In its subsequent discussion, the committee felt this would be best done through any changes the council might be able to make. In further discussions with Arup, a suggestion has arisen which we think could help without the need to revise council policy which,	Y	In para 5.144 bullet II has been amended to read: <i>'II. Where the proposed basement development is located within an area of concern regarding <u>impact on heritage assets</u>, slope stability, surface water or groundwater flow; or'</i> Para 5.150 b. VI has been edited to read: <i>'VI. Provision for a suitably qualified and experienced engineer from a recognised relevant professional body to <u>inspect, check for compliance and monitor the critical elements of permanent and temporary construction works throughout their duration supervise the works to ensure works are in accordance with the planning permission, building regulations and CMP;</u>'</i>

	<p>as Doug told the meeting, would take time. Along the same lines that Lambeth now requires independent review of BIAs, Camden Council goes a step further: in complex situations like ours, with listed buildings and difficult ground conditions, it places a condition on planning/listed building consents requiring independent monitoring of the construction. As Sarah said at the meeting, construction is of the utmost importance; Camden's approach adds a layer of protection, making damage far less likely and reassuring neighbours. There is no cost to the council as, like BIA reviews and Party Wall Surveyors, fees are paid by the developer.</p> <p>Camden's guidance can be found at https://www.camden.gov.uk/documents/20142/4823269/Basements+CPG+Jan+2021.pdf/43eb1f08-dc6b-0aa5-4607-bcfbe4ba60e6?t=1611580510428, and I've pasted the section on basement construction plans below with the key parts for construction management highlighted.</p> <p>On behalf of LERA, I'd like to ask if you would consider adopting something along these lines in Lambeth. If additional information is needed, or if there's anything else you need, please let me know. We could perhaps look at a meeting with Arup, or a case study paper.</p>	<p>To avoid confusion '<i>Please see Section 8</i>' has also been deleted from bottom of page 33</p>
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