

Site Allocations Development Plan Document

**Representations made by
organisations (Reg 20)**

This document contains all the representations made by organisations during the regulation 20 consultation process on the Site Allocation Development Plan Document (SADPD).

The contents pages show the unique representation number (R0...) alongside the name of the organisation who submitted the representation. For organisations who submitted more than one comment, subsequent submissions are labeled a, b, c etc accordingly.

Responses made via SurveyMonkey

- Where the text in the third column matches the text in the second column, this means the relevant box was ticked on the SurveyMonkey form.
- If the box in the third column contains 'n/a', this means it was left blank.

Navigating the document

- As the document is very large, it is advised to click on the name of the representation you would like to view. This will then allow you to skip straight to the page you would like to see.
- At the bottom right-hand corner of each page, the 'contents' button will take you back to the beginning of the document, to the first contents page.
- You can also navigate the document using the bookmark feature, which is allocated to each representation.

Accessibility

- To make this pdf easily accessible to those using mobile phones, we have compressed this document down to reduce the size of the file for download. This means the resolution of some representations may be lower than others. If you would like a higher resolution version of a specific representation, send an email to sadpd@lambeth.gov.uk along with the representation number e.g 'R0100'.

List of representations from organisations

R0001 Gloucestershire County Council Minerals and Waste Planning Policy

R0010 National Highways

R0013 Greater London Authority (GLA)

R0014 Transport for London

R0016 Natural England

R0022 Thames Water

R0029 Streatham Society

R0034 National Grid Electricity Transmission

R0048 Incredible Edible Lambeth

R0058 We Are 336

R0063 Hardest Yard Ltd

R0065 Port of London Authority

R0067 Norwood Forum

R0078 Station to Station

R0079 The Brixton Society

R0080 The Norwood Society

R0081 Black Thrive

R0082 MEC London Property 3 (General Partner) Limited

R0083 Elders Group Waterloo and Southbank

R0092 Green Group Cllrs'

R0097 Stop the Blocks Community Action Group

R0102 South Bank & Waterloo Neighbours (SoWN)

R0120 Guy's and St Thomas' NHS Trust

R0155 InStreatham

R0265 London Borough of Croydon

R0268 Norwood Action Group (NAG)

R0269 Waterloo Community Development Group

R0271 Loughborough Junction Action Group (LJAG)

R0274 West Norwood and Tulse Hill Community Stakeholder Group

R0275 Coin Street Community Builders (CSCB)

R0276 Unite Group PLC

R0278 Network Rail Property

R0281 HSBC Bank Pension Trust UK Ltd

R0282 Environment Agency

R0283 Places for London

R0284 Historic England

R0285 London Borough of Southwark

R0287 JLL on behalf of LPPI Real Estate Fund (managed by Knight Frank Investment Management)("LPPI")

R0293 Aquila Properties Limited

R0294 Guy's and St Thomas' NHS Trust (New submission)

R0299 Earlswood Homes

R0300 Streatham Alliance

R0305 AA Homes and Housing

From: Environment - Minerals & Waste Plans <[REDACTED]>
Sent: 11 March 2024 16:05
To: SADPD
Subject: PR2024/0077/1/LP Lambeth's Site Allocations Development Plan Document Proposed Submission

Follow Up Flag: Follow up
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Categories: Red category

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Your Reference: Lambeth's Site Allocations Development Plan Document Proposed Submission

Thank you for consulting the Minerals & Waste Policy team. On this occasion we have no comments to make.

This has not been circulated to other departments within Gloucestershire County Council. Please contact them directly if you wish to seek a response.

Email: [REDACTED]



Minerals & Waste Planning Policy
Strategic Infrastructure
Economy, Environment, Infrastructure
Gloucestershire County Council
Shire Hall
Westgate Street
Gloucester GL1 2TG

m-wplans@gloucestershire.gov.uk



Minerals Local Plan for Gloucestershire (2018 – 2032)
RTPI South West Awards for Planning Excellence 2020
Excellence in Plan Making Practice | Commendation

www.gloucestershire.gov.uk

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[REDACTED]

From: [REDACTED]
Sent: 17 April 2024 18:32
To: SADPD
Cc: [REDACTED]
Subject: [REDACTED] Lambeth's Site Allocations Development Plan Document Proposed Submission

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FAO: Planning Policy and Place Shaping, London Borough of Lambeth

Consultation: Lambeth's Site Allocations Development Plan Document Proposed Submission

Our ref: [REDACTED]

Dear Planning Policy Team

Thank you for your consultation of 8 March 2024 about Lambeth's Site Allocations Development Plan Document Proposed Submission.

National Highways was 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.

We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. The closest section of our network to Lambeth borough is M4 Junction 1, approximately 10 miles west of the borough.

As the borough of Lambeth is situated some distance from the SRN, we have no comment to make on the proposed site allocations development plan.

Please continue to consult us via [REDACTED]

Kind regards

Spatial Planning South East
National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: nationalhighways.co.uk

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National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF |
<https://nationalhighways.co.uk> | info@nationalhighways.co.uk

Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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**London Borough of Lambeth
Planning and Transportation
Lambeth Town Hall
Reception
Brixton Hill
London
SW2 1RW**

Department: Planning
Our reference: LDF22/LDD20/LP01/JB01
Date: 19th April 2024

By email: SADPD@lambeth.gov.uk

**Planning and Compulsory Purchase Act 2004 (as amended);
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local
Development) (England) Regulations 2012**

Re: London Borough of Lambeth Site Allocations Plan Regulation 19 Consultation.

██████████,

Thank you for consulting the Mayor of London on the proposed Lambeth Site Allocations Plan Regulation 19 consultation. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. A separate detailed response, which I endorse, has been prepared by Transport for London Spatial Planning on transport matters.

The Mayor previously provided comments on the Regulation 18 Consultation in February 2022 (Ref: LDF22/LDD20/LP01/JC01). This response follows on from the comments made in the previous consultation and should be read alongside each other. This letter provides advice and sets out where you should make amendments so that the draft Plan is consistent with the London Plan 2021 (LP2021). The LP2021 was formally published on the 2 March 2021, and now forms part of the London Borough of Lambeth's Development Plan and contains the most up-to-date policies.

The Mayor welcomes the work Lambeth have undertaken in the preparation of the Site Allocation Plan (SAP) to date, and the openness in which officers have worked with the Greater London Authority in making changes based on previous recommendations.

Particularly welcome is the removal of Site 19, Knollys Yard, responding to concerns the Mayor raised in his Regulation 18 response. The removal of the site means that any potential issues of general conformity with the LP2021 no longer apply.

Other changes in the SAP respond positively to the Mayor's comments made at the Regulation 18 stage to take account of sites located within the Brixton Creative Enterprise

GREATER LONDON AUTHORITY

Zone. These specifically related to LP2021 policies HC5, S4 and E3 of the LP2021 and the Mayor's Healthy Streets approach, all of which are welcomed by the Mayor.

It is noted that Site 20: Tesco, 13 Acre Lane, still retains an element of car parking associated with the proposed redevelopment of the supermarket. Policy T6.3 of the LP2021 sets out that retail development within areas of PTAL 5-6, such as Site 20, should be car-free. However, part G of Policy T6.3 does allow boroughs to consider amended standards if there is evidence of a significant reduction in the viability of mixed-use schemes in town centres.

Changes to the wording of the allocation from the previous version, now require a material reduction in the level of car parking and evidence to justify any proposed levels of parking above those set out in Table 10.5 of the LP2021. This means the allocation is now in line with the LP2021.

The Mayor welcomes several more changes from the earlier draft SAP. This includes amendments to allocation 24: King's College Hospital, which now includes a provision that any proposals to relocate the safeguarded waste use would need to comply with the requirements of LP2021 Policy SI9, and also allocation 7: 6-12 Kennington Lane, which now gives greater weight to the borough's location within the Central Services Area and an associated reference to paragraph 6.4.7 of the LP2021.

Next steps

I hope these comments help to inform the preparation of Lambeth's Site Allocation Plan. We continue to offer our support to work with you. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Jonathan Blathwayt on [REDACTED] or a [REDACTED]

Yours faithfully

[REDACTED]

[REDACTED]

Assistant Director of Planning

Cc: [REDACTED], London Assembly Constituency Member
[REDACTED], Chair of London Assembly Planning and Regeneration Committee
National Planning Casework Unit, DLUHC

By email only

London Borough of Lambeth
sadpd@lambeth.gov.uk

Transport for London
City Planning
5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

19/04/2024

Dear Sir/Madam,

Lambeth Local Plan site allocations – Proposed Submission Version (January 2024)

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the Lambeth Local Plan site allocations (proposed submission version).

The London Plan was published in March 2021, and forms part of Lambeth's Development Plan. Local Plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. We welcome requirements that Local Plan and London Plan parking standards will need to be met.

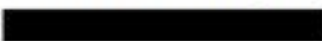
Our comments on specific modifications and suggestions for amendments or wording improvements are detailed below. We previously responded to the regulation 18 consultation draft in February 2022 and so our comments are provided in the form of an update to the regulation 18 response which is set out in the final column of the table. We look forward to working with the Council to finalise the Local Plan site allocations as it moves towards adoption.

Yours faithfully,



Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

Email: 

[REDACTED]

From: Jonathan Blathwayt [REDACTED]
Sent: 19 April 2024 11:27
To: SADPD
Subject: Lambeth Site Allocations Reg 19 - Mayor of London and Transport of London's Responses
Attachments: Mayor of London Response to LBL SAP.pdf
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Flag Status: Flagged
Categories: Green category, Purple category

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Hello,

Please see attached the Mayor of London and Transport for London's responses to the Lambeth Site Allocations Regulation 19.

Many thanks

Jonathan Blathwayt

Senior Strategic Planner, London Plan and Growth Strategies Team
GREATERLONDONAUTHORITY
Union Street, London SE1 0LL

[london.gov.uk](https://www.london.gov.uk)
[REDACTED]

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From: Richard Carr [REDACTED]
Sent: 19 April 2024 17:10
To: SADPD
Cc: [REDACTED]
Subject: Lambeth's Site Allocations Development Plan Document Proposed Submission - TfL comments
Attachments: Lambeth Local Plan Site Allocations Reg. 19 - TfL response FINAL.pdf
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Categories: Red category

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Thank you for consulting Transport for London (TfL) on the Lambeth Site Allocations DPD Proposed Submission. Please find attached TfL's representation which is also included as part of the response sent by the GLA

Best wishes
Richard Carr

Richard Carr | Principal Planner - Spatial Planning (He/Him/His)
TfL Planning, Transport for London
E: [REDACTED]

I work part time and so there may be a short delay in responding to emails

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process

For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

From: Lambeth Council <info@email.lambeth.gov.uk>
Sent: 08 March 2024 12:50
To: Richard Carr [REDACTED]
Subject: Share your views on Lambeth's Site Allocations Development Plan Document Proposed Submission

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Appendix A: Specific comments on Lambeth Local Plan site allocations

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 1 - Royal Street, SE1	<p>The site is bordered by Lambeth Palace Road which forms part of the Transport for London Road Network (TLRN). Any changes to access and proposals for transport interventions on the TLRN including a new pedestrian/cycle crossing on Lambeth Palace Road will need to be assessed by, and subject to, TfL agreement. Street trees will also need to be protected. The site has been subject to recent pre-application discussions and we have requested contributions to buses and the Waterloo Northern line step free access project as part of the transport mitigation package. We would also expect a contribution towards cycle hire capacity and Legible London signage and that the development facilitates the Low Line walking route alongside the railway viaduct. We would expect a substantial reduction in onsite car parking, consistent with the London Plan and NHS/public health targets of increasing the overall health of the public. All these requirements should be summarised in the site allocation to provide clarity and to ensure a consistent approach. The development also provides the opportunity to rationalise servicing off-street. As referenced in the site allocation, the impact of servicing and construction could be minimised through use of shared servicing arrangements and freight consolidation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.</p>	<p>There do not appear to have been any changes made to the transport and access requirements in response to TfL comments. We reiterate our request that there should be a requirement to substantially reduce car parking to comply with London Plan requirements for the offices, residential and any retail development to be car free. Contributions towards buses, Waterloo Northern line step free access, cycle hire capacity and Legible London signage should all be specified as well as facilitating the Low Line walking route.</p> <p>The transport and access context should state that Lambeth Palace Road (not South Lambeth Road) forms part of the TLRN.</p>

<p>Site 2 - St Thomas' Hospital, SE1</p>	<p>The site is bordered by Lambeth Palace Road and Westminster Bridge Road which form part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN including a new pedestrian/cycle crossing on Lambeth Palace Road will need to be assessed by, and subject to, TfL agreement. Street trees will need to be protected. There is an opportunity to improve pedestrian and cycle connectivity from Lambeth Palace Road to the riverside and to rationalise existing vehicle crossovers on Lambeth Palace Road. Depending on the scale of development, we may require contributions to buses and the Waterloo Northern line step free access project as part of the transport mitigation package. We would also expect a contribution towards cycle hire capacity and Legible London signage. We would expect a substantial reduction in on site car parking, consistent with the London Plan and NHS/public health targets of increasing the overall health of the public. All these requirements should be summarised in the site allocation to provide clarity and to ensure a consistent approach. The development also provides the opportunity to rationalise servicing off-street. As referenced in the site allocation, the impact of servicing and construction could be minimised through use of shared servicing arrangements and freight consolidation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.</p>	<p>There do not appear to have been any changes made to the transport and access requirements in response to TfL comments. We reiterate our request that there should be a requirement to substantially reduce car parking. Potential contributions towards buses, Waterloo Northern line step free access, cycle hire capacity and Legible London signage should all be specified.</p> <p>The transport and access context should state that Lambeth Palace Road (not South Lambeth Road) forms part of the TLRN.</p>
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Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 8 - 110 Stamford Street, SE1	Stamford Street forms part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN will need to be assessed by, and subject to, TfL agreement. A safety scheme is currently being developed to reduce speeds on Stamford Street, although designs for this section are still in progress. There is an opportunity to improve the quality of the footway, which could be included in a section 278 agreement with TfL. As referenced in the site allocation, the impact of servicing and construction could be minimised through use of shared servicing arrangements and freight consolidation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.	We welcome confirmation that planning obligations may include contributions towards Cycleway C10 as well as the Spine Route. The transport and access context should state that Stamford Street forms part of the TLRN.
Site 9 - Gabriel's Wharf and Princes Wharf, Upper Ground SE1	As stated, the site is close to the South Bank Spine Route project and, as such, a contribution towards the project should form part of the transport mitigation. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development.	We welcome confirmation that planning obligations may include contributions towards the Spine Route.

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 17 - 330-336 Brixton Road SW9	<p>Brixton Road forms part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN will need to be assessed by, and subject to, TfL agreement. The A23 Streetspace scheme extends past this site, although no changes have been made to road layout at this location. No servicing should take place from the Brixton Road frontage and, as such, we would support a clearer requirement for servicing to be from Winan's Walk (to the rear). We would also strongly support removal of all vehicle crossovers to allow for an improved public realm and footway on Brixton Road. This could be included in a section 278 agreement with TfL. We welcome confirmation that Local Plan and London Plan parking standards will apply.</p>	<p>We are concerned that changes to the transport, movement and public realm requirements now allow for disabled persons' parking on the Brixton Road frontage which is likely to prejudice the delivery of public realm and footway improvements. The requirements should make it clear that all vehicle access for servicing or access to disabled persons' parking spaces should be from Winan's Walk.</p> <p>Any use linked to sustainable last mile distribution/logistics or 'just-in-time' servicing should utilise cargo bikes and minimise the need for vehicle access.</p> <p>We welcome confirmation that 'Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network on Brixton Road.'</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 20 – Tesco, 13 Acre Lane, SW2	<p>We do not accept the claim that ‘A replacement supermarket of equivalent net sales area to the existing store is expected to need an appropriate level of parking to operate effectively’. This is contrary to the statement that London Plan and Local Plan parking standards will apply which we support. The site is in a major town centre and has a PTAL of 6a and so it is required by the standards to be car free. Data from the 2011 census shows that 63.9% of households do not have access to a car within 800m (10-minute walk) of the site and the density of the bus network means that car-free travel is very easy for those travelling from further afield. The site also forms part of a Low Traffic Neighbourhood. Given the age of the data, and evidence that car-ownership reduced dramatically within two years of implementing an LTN, current car ownership is likely to be even lower. For all of these reasons, any redevelopment should only provide Blue Badge parking. Town centre retail in a location with a high level of connectivity does not require car parking. The provision of parking can add to development costs and uses up valuable space that can be used to optimise development density or to enhance the public realm. Additionally, evidence has shown that town centre vibrancy and vitality is better supported by welcoming public realm and enjoyable places to dwell, both of which are undermined by encouraging access by car.</p>	<p>We welcome amended wording in the Transport, Movement and Public Realm section that now states ‘A material reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. An applicant will need to provide an evidence-based justification to justify any level of parking over and above London Plan standards. Any car parking that is provided will need to focus on disabled persons parking and electric vehicle charging. Non-car access and pedestrian accessibility to the store should be positively promoted through scheme design.’ As previously stated in this location London Plan standards would require a car free development (apart from disabled persons parking).</p> <p>We welcome confirmation that ‘Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network.’</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 21 – 51-65 Effra Road, SW2	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. All existing car parking on the site should be removed consistent with London Plan Policy T6L which states that: ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy’. Due to the PTAL, this would require a car free development. Any redevelopment of the site should minimise impacts on the bus lane and bus stands on Effra Road, including during construction.</p>	<p>We reiterate comments that existing car parking should be removed and development should be car free with vehicle access restricted to disabled persons’ parking and servicing. This should be made clear in the transport, movement and public realm section.</p> <p>Any use linked to sustainable last mile distribution/logistics or ‘just-in-time’ servicing should utilise cargo bikes and minimise the need for vehicle access.</p> <p>We welcome confirmation that ‘Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network.’</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 3 - 35– 37 and Car Park Leigham Court Road SW16	<p>The site is close to Streatham Hill and Streatham High Road which forms part of the TLRN. At the southern end of Streatham Hill, TfL is developing a Healthy Streets scheme aimed at reducing speeds, providing cycle facilities, and improving conditions for pedestrians. A contribution towards these Healthy Streets improvements may be appropriate as part of the transport mitigation package. We welcome confirmation that Local Plan and London Plan parking standards will apply. All existing car parking on the site should be removed consistent with London Plan Policy T6L which states that: ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy’. Due to the PTAL, this would require a car free development.</p>	<p>We reiterate comments that existing car parking should be removed and development should be car free with vehicle access restricted to disabled persons’ parking and servicing. This should be made clear in the transport, movement and public realm section.</p> <p>We welcome confirmation that ‘Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network.’</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 18 - 286–362 Norwood Road SE27	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. All existing car parking on the site should be removed consistent with London Plan Policy T6L which states that: ‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy’. Due to the PTAL, this would require a car free development.</p>	<p>We reiterate comments that existing car parking should be removed and development should be car free with vehicle access restricted to disabled persons’ parking and servicing. This should be made clear in the transport, movement and public realm section.</p> <p>Any use linked to sustainable last mile distribution/logistics or ‘just-in-time’ servicing should utilise cargo bikes and minimise the need for vehicle access.</p> <p>We welcome confirmation that ‘Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network.’</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 19 – Knolly’s Yard, SW16	The severance caused by rail lines and limited access will need to be addressed. We therefore support proposed connectivity improvements which will improve access to existing public transport services. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, which is expected to increase as a result of the proposed connectivity improvements, this would require a car free development. The site is adjacent to tracks used by National Rail services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.	We note that this site is not included in the Regulation 19 site allocations.

<p>Site 7 - 6–12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11</p>	<p>Kennington Lane forms part of the TLRN. Any changes to access and proposals for transport interventions on the TLRN will need to be assessed by, and subject to, TfL agreement. Specifically, any proposals for changes to the access affecting the signalised junction and relocation of the crossing would need to be subject to a TfL Road Safety Audit and Technical Approvals process. All costs of changes to the signalised junction and/or crossing would need to be covered by the developer. This is a constrained section of the Inner Ring Road on the approach to a major junction, so any construction would need to be carefully managed. We welcome the statement that no servicing should take place from Kennington Lane and that the footpath along the frontage should be widened as part of the development. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development. Contributions towards active travel connections, cycle hire provision and buses may be appropriate.</p>	<p>We note that in the transport, movement and public realm section proposals for servicing have been clarified as follows:</p> <p>‘Any partial redevelopment of the site should ensure that later phases can also be serviced from Kennington Lane rather than Dugard Way. On-street servicing on Kennington Lane is unacceptable. Servicing is to be accommodated on site, with all vehicles able to enter and exit in forward gear.’</p> <p>We reiterate comments that development should be car free with vehicle access restricted to disabled persons’ parking and servicing. This should be made clear in the transport, movement and public realm section.</p> <p>Any use linked to sustainable last mile distribution/logistics or ‘just-in-time’ servicing should utilise cargo bikes and minimise the need for vehicle access.</p> <p>We welcome confirmation that ‘Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network.’ However, this should be expanded to refer to potential contributions</p>
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Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
		towards active travel connections, cycle hire provision and buses, in line with our previous comments.
Site 22 - 1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. Although the PTAL is 3, the site borders areas of PTAL 4 and 5, so a car free development would be supported.</p> <p>Contributions towards active travel connections, cycle hire provision and Loughborough Junction station may be appropriate. The site is adjacent to tracks used by London Overground services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.</p>	<p>Any use linked to sustainable last mile distribution/logistics or ‘just-in-time’ servicing should utilise cargo bikes and minimise the need for vehicle access.</p> <p>We welcome confirmation that ‘Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network on Coldharbour Lane, improvements to local cycling infrastructure and Loughborough Junction station.’ However, the scope should be extended to include safeguarded land and/or financial contributions to enable the expansion of Santander cycle hire to the Loughborough Junction area.</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 23 - Land at corner of Coldharbour Lane and Herne Hill Road SE24	<p>We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development. Contributions towards active travel connections, cycle hire provision and Loughborough Junction station may be appropriate. The site is adjacent to tracks used by National Rail services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.</p>	<p>We reiterate comments that development should be car free with vehicle access restricted to disabled persons' parking and servicing. This should be made clear in the transport, movement and public realm section.</p> <p>Any use linked to sustainable last mile distribution/logistics or 'just-in-time' servicing should utilise cargo bikes and minimise the need for vehicle access.</p> <p>We welcome confirmation that 'Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network on Coldharbour Lane, improvements to local cycling infrastructure and Loughborough Junction station.'</p> <p>However, the scope should be extended to include safeguarded land and/or financial contributions to enable the expansion of Santander cycle hire to the Loughborough Junction area.</p>

Reference	Regulation 18 - Track change/comment	Regulation 19 updated comments
Site 24 - King's College Hospital, Denmark Hill SE5	We would expect a substantial reduction in on site car parking, consistent with the London Plan and NHS/public health targets of increasing the overall health of the public. We welcome confirmation that Local Plan and London Plan parking standards will apply. Due to the PTAL, this would require a car free development. Contributions towards active travel connections, cycle hire provision and Denmark Hill station may be appropriate. The site is adjacent to tracks used by London Overground services and so any proposed development will need to meet the standard requirements for the protection of, and continued access to, rail infrastructure.	We reiterate comments that there should be a substantial reduction in on site car parking and that any new development should be car free with vehicle access restricted to disabled persons' parking and servicing. This should be made clear in the transport, movement and public realm section. We welcome confirmation that 'Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network on Coldharbour Lane.' However, the scope should be extended to include safeguarded land and/or financial contributions to enable the expansion of Santander cycle hire to the Loughborough Junction area.

From: SM-NE-Consultations (NE) [REDACTED]
Sent: 19 April 2024 14:36
To: SADPD
Subject: FAO Lambeth Planning Policy Team REF: Site Allocations Development Plan Document
Attachments: 469377 Natural England Response Letter Lambeth Site Allocations DPD.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category, Purple category

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Your Ref: Site Allocations Development Plan Document
Our Ref: 469377

Dear Sir or Madam

Thank you for your consultation request dated and received by Natural England on 8th March 2024.

Please find attached Natural England's response letter to your consultation request.

If you have any queries, please contact [REDACTED]

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

Enquiries line: [REDACTED]
[REDACTED]

Date: 19th April 2024
Our ref: 469377
Your ref: Local Plan – Site Allocations Development Plan Document



The Lambeth Planning Policy Team
Lambeth Council
Lambeth Town Hall
1 Brixton Hill
Brixton
London SW2

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY - sadpd@lambeth.gov.uk

Dear Sir or Madam

Lambeth Council – Site Allocations Development Plan Document

Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 8th March 2024.

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.

Natural England have **no comments** to make on the Site Allocations Development Plan Document for your Local Plan.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Sharon Jenkins
Operations Delivery
Consultations Team
Natural England

From: Chris Colloff [REDACTED]
Sent: 25 April 2024 16:37
To: SADPD
Cc: Nicky Mchugh; Devcon Team
Subject: Lambeth Site Allocations DPD Consultation
Attachments: Lambeth site allocations Apr24.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category

You don't often get email from [REDACTED] [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,
Please find attached site specific comments in relation to water and wastewater infrastructure impacts of the proposed sites allocations. We would encourage developers to engage with us ahead of any planning applications being submitted to discuss their development proposals and the water and wastewater infrastructure requirements in line with the subtext to Policy EN6 of the adopted Local Plan.

Kind regards,

Chris Colloff

Planner
[REDACTED]

1st Floor West, Clearwater Court, Vastern Road, Reading, Berkshire, RG1 8DB

Working schedule: Monday to Thursday



It's everyone's water

Visit us online www.thameswater.co.uk , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended

Site ID	Site Name	Water Response	Waste Response	Internal Comments
55906	110 STAMFORD STREET, LONDON, SE1	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.
72253	300-346 Northwood Road SE27	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

72264	330-336 Brixton Road, SW9	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	
72260	35-37 & Car Park, Leigham Court Road, London	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.

76771	51–57 Effra Road SW2	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.</p>
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72258	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.
72263	Gabriel's Wharf and Prince's Wharf, Upper Ground, SE1	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	

72259	Hardess Yard, 1-4 Hardess Street, London, SE24 0HN	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
76774	King's College Hospital, Denmark Hill SE5	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	

72261	Land at corner of Coldharbour Lane and Herne Hill Road SE24	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
71359	Royal Street Site, South Bank, London, SE1 7LW (Pending)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.

72254	St Thomas' Hospital	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	
72262	Tesco, 13 Acre Lane SW2	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.

Site ID	Site Name	Water Response	Waste Response	Internal Comments
55906	110 STAMFORD STREET, LONDON, SE1	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.
72253	300-346 Northwood Road SE27	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	

72264	330-336 Brixton Road, SW9	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	
72260	35-37 & Car Park, Leigham Court Road, London	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.

76771	51–57 Effra Road SW2	<p>The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.</p>	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ</p>	<p>This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.</p>
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72258	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.
72263	Gabriel's Wharf and Prince's Wharf, Upper Ground, SE1	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	

72259	Hardess Yard, 1-4 Hardess Street, London, SE24 0HN	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
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72261	Land at corner of Coldharbour Lane and Herne Hill Road SE24	On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
71359	Royal Street Site, South Bank, London, SE1 7LW (Pending)	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.

72254	St Thomas' Hospital	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the clean water infrastructure. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	The level of information contained in this document does not enable Thames Water to make an assessment of the impact the proposed site allocations will have on the waste water network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the location, type and scale of development together with the anticipated phasing.	
72262	Tesco, 13 Acre Lane SW2	The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development .	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	This assessment is based on the residential element. Further assessment may be required to determine any impact of the office development.

From: Tim Whitaker [REDACTED]
Sent: 29 April 2024 08:01
To: SADPD
Subject: Lambeth Site Allocations DPD - SA3

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category

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I am writing on behalf of the Streatham Society regarding the consultation on Lambeth Site Allocations DPD. This relates to SA3- 35-37 and Car Park Leigham Court Road SW16.

We support the development of the car park area for other usages. At present it isn't used and doesn't contribute to that part of the conservation area.

However, we are against the indicative approach that has been used as this seems to be too large a mass and will impact on views in the area. There are concerns from residents in the Leigham Court Estate that this affects their views.

Dorchester Parade has been approved opposite to be a seven storey building with a rather unsightly top floor which detracts from the area and it is unclear whether any new building on the car park site will be the same seven storey development.

The difficulty is that if this is permitted then it requires a sensitive application but on past record there is no confidence that PAC will scrutinise effectively to ensure that any development is architecturally tasteful and in keeping with the area.

Tim Whitaker
Trustee Streatham Society



From: National Grid (Avison Young - UK) [REDACTED]
Sent: 29 April 2024 17:05
To: info@email.lambeth.gov.uk; SADPD
Subject: RE: Share your views on Lambeth's Site Allocations Development Plan Document Proposed Submission
Attachments: Proposed Site 24.pdf; 29-04 Lambeth LP.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category, Purple category

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Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via [REDACTED] if you require any further information or clarification.

Kind Regards
Tom

Tom Wignall
Graduate Planner

Mobile [REDACTED] | avisonyoung.com

From: Lambeth Council <info@email.lambeth.gov.uk>
Sent: Friday, March 8, 2024 12:50 PM
To: National Gas [REDACTED]
Subject: Share your views on Lambeth's Site Allocations Development Plan Document Proposed Submission

CAUTION: External Sender

[Click to view in your browser](#)



Our Ref: MV/ 15B901605

29 April 2024

Lambeth Council
sadpd@lambeth.gov.uk
via email only

Dear Sir / Madam
**Site Allocations Development Plan Document
March – May 2024
Representations on behalf of National Grid**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Reference	Asset Description
Proposed Site 24 – King's College Hospital, Denmark Hill, SE5	0Kv Underground Cable route: LPT2 Planned

A plan showing details of the site locations and details of NGET assets is attached to

this letter. Please note that this plan is illustrative only. The following link provides information on the proposed NGET London Power Tunnels. Tunnel construction is well underway with the project due to be complete and fully operational in 2027.

<https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/london-power-tunnels-project>

Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.

We propose modifications to the above site allocations and/or policies to include wording to the following effect:

Proposed Site 24: King's College Hospital, Denmark Hill SE5

"2. The development will be developed with the following site-specific criteria

j. a strategy for responding to the NGET underground cables lines currently under construction, present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Please see attached information outlining further guidance on development close to NGET assets.

NGET also provides information in relation to its assets at the website below.

- <https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps>

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET infrastructure.

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.



To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect NGET's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

Matt Verlander, Director

[Redacted signature]

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

Tiffany Bate, Development Liaison Officer

[Redacted signature]

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[Redacted signature]

**Matt Verlander MRTPI
Director**

[Redacted signature]

[Redacted signature]
For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

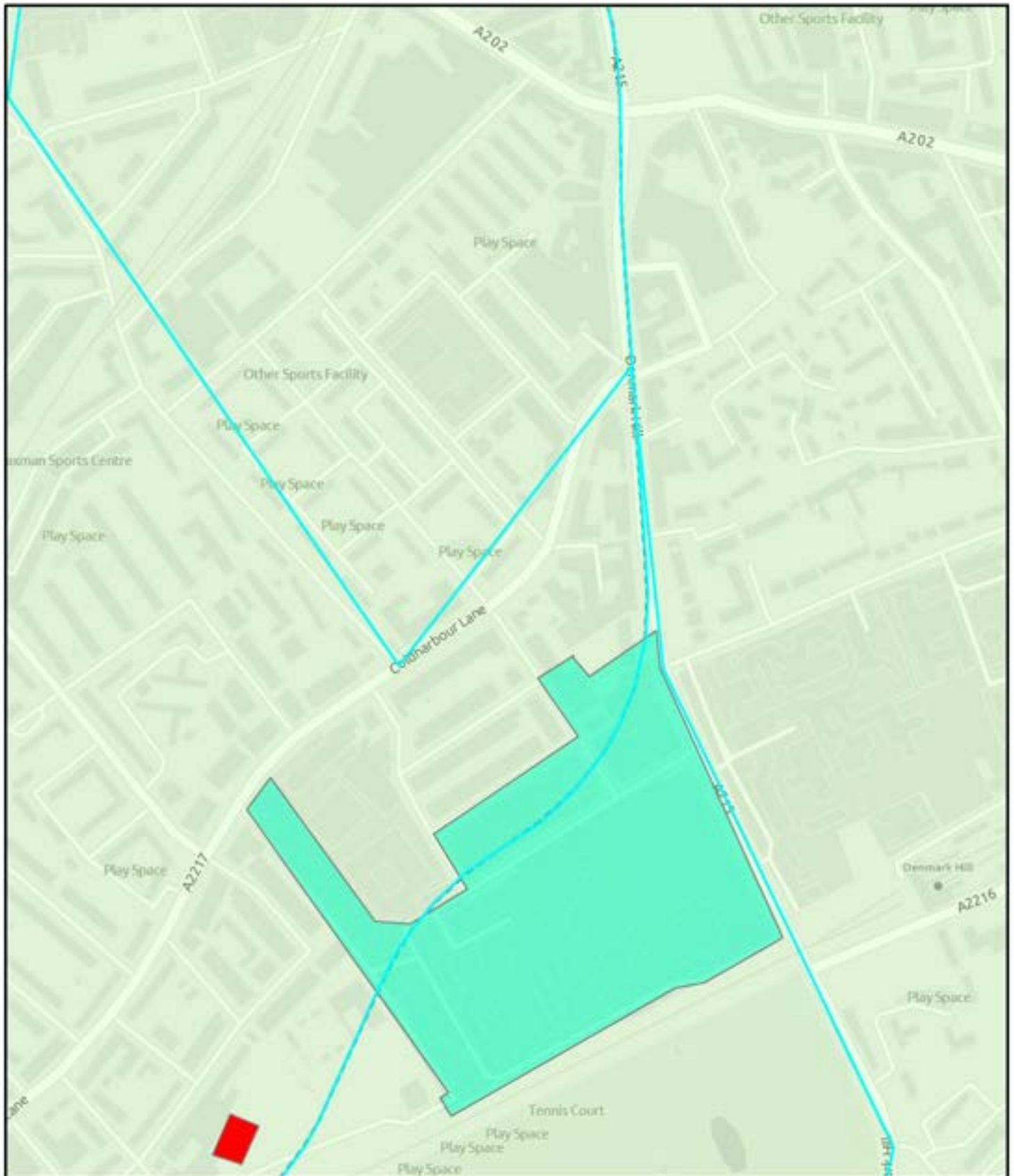
NGET's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

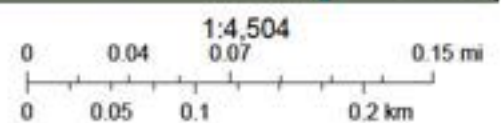
For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

King's College Hospital, Denmark Hill SE5



29/04/2024, 16:56:34

- Development_Plan_Monitoring_v2_7386
- Electric_Assets_3956
- Electric_Assets_7634
- 132 & Below
- Development_Plan_Monitoring_v2_977_5701
- Development_Plan_Monitoring_v2_977



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From: Victoria Sherwin [REDACTED]
Sent: 30 April 2024 11:53
To: SADPD
Subject: Site allocations consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category

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Hi

I am writing on behalf of Incredible Edible Lambeth to ask that due consideration is given to including green space and in particular food growing space in all new developments.

Food growing proven to be the best way to enhance biodiversity in an area; it supports good mental health, builds community, provides employment and improves access to healthy, affordable food.

If you are concerned to build a healthy, cohesive city, food growing should be included.

All the best

Victoria Sherwin
Director, IEL



From: Victoria Sherwin [REDACTED]
Sent: 30 April 2024 15:43
To: SADPD
Subject: Re: Site allocations consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category

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Hi

See the new borough plan for Walthamstow:

Strong detailed policies for dense urban borough

London borough, Waltham Forest, has adopted its new [local plan](#). Food policy plays a large part in policies for health and for the economy.

Food growing

Food growing is encouraged for its contribution towards healthy communities (Policy 48). "Food growing can benefit the physical and mental well-being of residents through the provision of fresh and healthy food, as well as exposure and access to the natural environment and wildlife." Detailed Policy 84 'Food Growing and Allotments' sets out how this will be secured. Specifically:

"Development proposals will be expected to contribute to the supply, quality and accessibility of private and communal spaces on which to grow food and flowers. This may be in the form of financial or on-site contributions. On-site contributions must be supported by a maintenance plan at application stage."

All the best

Victoria

On Tue, 30 Apr 2024, 11:52 Victoria Sherwin, [REDACTED] wrote:

[REDACTED]

From: [REDACTED]
Sent: 01 May 2024 10:55
To: SADPD
Cc: [REDACTED]
Subject: Response to consultation
Attachments: Response to consultation exercise into proposed Site Allocation 17 Lambeth draft SADPD 30.odt

Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category

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I attach a response to Lambeth's consultation exercise on its proposed SADPD for 332-336 Brixton Road SW9.

regards

Eileen Thomas

Chair of Trustees Lambeth Accord

336, Brixton Road SW9 7AA

Telephone: [REDACTED]



Response to consultation exercise into proposed Site Allocation 17 Lambeth draft SADPD 30.05.24

I write on behalf of the trustees of Lambeth Accord known locally as 'We are 336', which owns 336 Brixton Road - part of Lambeth's proposed Site Allocations DPD for this and the three adjacent sites to the north. Lambeth Accord's main purpose is to assist charities working with people with disabilities. We responded to Lambeth Council's earlier consultation exercise on its draft SADPD proposals where our main comments were:

- No objection to comprehensive redevelopment of all four sites subject to our being able to proceed independently of others if necessary.
- No objection to retaining the façade of 'We are 336', subject to any sympathetic adjustment required to fit the accommodation proposed behind it. This would include possible removal of the ramp which was a later addition to the building.
- No objection to a reasonable sized footway along the east side of Winans Walk subject to there being provision for servicing buildings.
- Objection to the introduction of a grassed front garden to the 'We are 336' building, bordering Brixton Road. We stated that it is essential that we retain the small carpark for disabled people here (with some perimeter planting), especially as the vehicular access at the rear via Winans Walk and Wynne Road is very indirect. It is also important that disabled visitors use the same entrance as everyone else.

These concerns appear to have been met in the proposed submission documents and we therefore raise no further objections.

On a more general point, although it is accepted that it is only indicative, we would welcome layout shown in the Lambeth SADPD Proposed Submission Version - Design Evidence in that it allows an east-west pedestrian route across the site to link with buses on Brixton Road. It also gives the opportunity for some potential ventilation/daylighting to our northern boundary.



Eileen Thomas

Chair of Trustees Lambeth Accord

From: Dylan Kerai [REDACTED]
Sent: 01 May 2024 15:44
To: SADPD
Cc: [REDACTED]
Subject: Representations to the SADPD
Attachments: 240429 Site allocations reps.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category

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Dear Sir/Madam,

Please find attached, on behalf of our client Hardess Yard Limited, representations to the Site Allocations Development Plan Document Proposed Submission.

I would be grateful if you could confirm receipt of the attached. Many thanks.

Kind regards,

Please note my new email address [REDACTED] for all future correspondence.

Dylan Kerai
Associate (MRTPI)

MADDOX PLANNING

[REDACTED]
www.maddoxplanning.com

33 Broadwick Street, London W1F 0DQ



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Jeff Holt
London Borough of Lambeth

29/04/2024

Land at Hardess Yard, Hardess Street London, England SE24 0HN: Representations to the Site Allocations Development Plan Document Proposed Submission (SADPD PSV).

Dear Jeff

These representations are submitted on behalf of our client, Hardess Yard Limited, in response to the consultation on the Site Allocations Development Plan Document Proposed Submission (SADPD PSV). These representations solely focus on the proposed allocation at '1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street' under 'Proposed Site 22'. Hardess Yard Limited is the owner of site 22.

We support the Council's intention to work towards adoption of a new Site Allocations Development Plan Document and meet the identified housing need within the Borough through the development of the allocated sites. Furthermore, we principally support the Proposed Site 22 allocation for mixed use development and new purpose-built light industrial accommodation.

Application ref. 24/00073/FUL

As Officers will be aware, an application is currently pending consideration under ref. 24/00073/FUL on 'Proposed Site 22'. The full description of development is set out below.

"The demolition of all existing buildings and construction of a phased, mixed use, co-living scheme (comprising a co-living building (Sui Generis) with all associated amenity and ancillary spaces) and separately contained light industrial building (Use Class E(g)(iii)) and associated access, parking, amenity, public realm (including associated highway works) and landscaping".

Prior to the submission of this application, extensive consultation was undertaken on the development with Planning Officers at Lambeth Council and the Greater London Authority, as well as the Lambeth Design Review and local Ward Councillors. A Planning Performance Agreement was entered into with Lambeth with the total pre-application engagement period being over 18 months up to the date of submission.

Officers have confirmed that the principle of development is acceptable in terms of the land use proposed. Officers have also confirmed that the height, scale and massing of the proposed development is acceptable. This follows on from following several design re-iterations made prior to the application submission and through the formal PPA process and two Design Review Plan meetings. The principle of development and height/scale massing of the development proposed under 24/00073/FUL is also supported by the GLA and confirmed in the Stage 1 Report which was issued in April 2024.

Land use

The redevelopment of the site for residential development and the reprovision of purpose-built light industrial accommodation is supported. However, with regards to the residential provision, the allocation should be explicit in identifying large scale purpose built shared living accommodation as a use that can contribute towards the residential provision on site.

Policy H16 of the London Plan sets out the criteria for co-living schemes, and this is also aided by the Greater London Authority ('GLA') co-living guidance document. It is clear from both Policy H16 and the adopted guidance that it is the GLA's intention for such sites to come forward in areas that are well-connected to local services and employment by walking, cycling and public transport. Policy H13 of the Lambeth Local Plan also sets out that proposals for large-scale purpose-built shared living ('PBSL') will be supported where they meet both the requirements of London Plan policy H16 and additional Lambeth-specific requirements.

Therefore, the Site is ideal for purpose built shared living use and is also compliant with both London Plan policy H16 and Local Plan policy H13. The site is well connected to local services, has good accessibility to public transport, contributes to creating mixed communities and includes a detailed management plan. This development would be the first in Lambeth to deliver PBSL accommodation and therefore, must also be seen to contribute the creation of mixed communities in Loughborough Junction and Lambeth as a whole.

It is also pertinent to note that although purpose built shared living is classified as non-self-contained accommodation and is a 'sui generis' use in the Use Classes Order, it is considered as 'housing' for monitoring purposes through the Council's and GLA's monitoring reports. The London Plan sets out that such schemes count towards meeting housing targets based on a 1.8:1 ratio, with 1.8 shared living bedrooms/units being counted as a single home.

In addition to the above, as part of the pre-application discussions on the site the Design Review Panel response set out that *'The Chair commended the work to date on the proposal and the excellent presentation for the first co-living scheme in Lambeth which the Panel consider is the right use for this location.'*

It is therefore clear that large scale purpose built shared living (co-living) accommodation is appropriate for this site, is supported by relevant stakeholders for uses on this site and ultimately should be included within the wording of 'Proposed Site 22' as a use that can come forward for development on this site.

Height

With regards to height, it is noted that the wording within 'Proposed Site 22' refers to 'a maximum building height of 40 metres' The allocation plan also shows a general height across the site as 26 metres. This is a reduction from the previous Site Allocation document which set out a taller maximum height (47m) and general height across the site of 36 metres. There appears to be no evidence behind this reduction in maximum height.

Having engaged with Lambeth Officers through formal pre-application discussions, the GLA and undertaking a formal DRP process for application ref. 24/00073/FUL it was confirmed across all this engagement that the proposed height of the development (47 metres) is acceptable in design, scale massing and townscape terms. Indeed, the Design Review Panel response to the application development confirmed that the *'proposed massing was the right approach'*.

The recent GLA stage 1 responses goes into detail and sets out the following:

"The architectural approach and layout of the proposed buildings is supported. Although the site has not been identified as suitable for a tall building, the proposed height does not raise any strategic concerns as it is generally consistent with the emerging height controls for the site and the proposal is not likely to result in any unacceptable visual, functional, environmental or cumulative impacts".

There is no clear reasoning as to why the height has been reduced within the allocation and the submitted application clearly demonstrates a building with a maximum height of 47 metres can come forward and has

indeed, been worked up with support from Lambeth design officers and Design Review Panel alongside the GLA. It is therefore imperative that the 'maximum building height of 40 metres' and 'general building height of 26 metres' set out within the Site 22 Allocation policy should be amended to allow for a height of at least 47 and 36 metres as per the original Regulation 18 version of the Site Allocations document.

Summary

1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street' under 'Proposed Site 22' for mixed use development and new purpose-built light industrial accommodation is supported. However, specific wording should be incorporated to support large scale purpose built shared living.

Furthermore, the reference to maximum heights of 40 metres and general height across the site of 26 metres should be amended back to at least 47 metres and 36 metres respectively given the comments received on application ref. 24/00073/FUL from Lambeth Officers, the GLA and DRP. This provides the Council with clarity that a development of 47 metres in height can come forward without causing undue harm.

Thank you for providing us with the opportunity to comment on the Regulation 19 version of the Site Allocations DPD. We would be very grateful for confirmation that these representations have been received and confirm that we would like to be involved in future stages of the process.

We trust the comments are helpful and clear. Should you have any comments, please do not hesitate to contact me at your earliest convenience.

Yours sincerely



Dylan Kerai
Associate (MRTPI)



ref: 1168 – Hardess Yard, Lambeth

From: Hardy, Maeliosa (Capita Public Service) [REDACTED]
Sent: 01 May 2024 16:58
To: SADPD
Cc: [REDACTED]
Subject: Consultation Response: Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV)
Attachments: PLA consultation response - Lambeth Site Allocations DPD.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category, Purple category

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Good afternoon

Thank you for consulting with the Port of London Authority (PLA) on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV). Please see our comments attached.

If there is anything further we can assist with, please get in touch.

Regards,
Maeliosa

Maeliosa Hardy
Planning Consultant, on behalf of PLA
Capita Local Public Services



This email is security checked and subject to the disclaimer on web-page:
<https://www.capita.com/email-disclaimer.aspx>

London River House
Royal Pier Road Gravesend
Kent DA12 2BG
United Kingdom

Web: www.pla.co.uk

London Borough of Lambeth
Planning Policy and Place Shapin
PO Box 80771
London
SW2 9QQ

1st May 2024

Port of London Authority (PLA) Response: London Borough of Lambeth Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV)

Thank you for the invitation to comment on the above consultation on the SADPD PSV. We have now had the opportunity to review the document and have the following comments to make.

The PLAs key interests with regard to this consultation are on the health and safe use of the river and to enable the use of the Tidal Thames alongside any forthcoming development. Therefore, sites SE1, 2, 8 and 9 within the Waterloo and South Bank Allocations are of particular focus within our response.

We note that Sites SE1, 2 and 9 lie within the Thames Policy Area (TPA) although this is not included within the site maps, which we feel is an important designation to include as a visual reference. We also consider that the vision for these sites should reflect 'indicative location for potential/enhanced pedestrian connection' within the context of illustrating wider linkages to/from the Thames Path and the riverside where relevant. This would be in line with paragraphs 9.14.5-7 of the London Plan to ensure that due consideration has been given to maximising the benefits of the river location of these sites.

Within the Site Allocation Policy section on transport, movement and public realm, there is no reference to riverbus services, which the PLA consider must be included in line with Policy SI15 (Water Transport) of the London Plan and Policy T5 (River Transport) of the Lambeth Local Plan.

For the aforementioned sites located in close proximity to the Tidal Thames, reference should also be made to London Plan Policy SI16 (Waterways – use and enjoyment) and Policy Q24 (River Transport) of the Lambeth Local Plan within the Site Allocation Policy on access to open space and nature conservation to ensure inclusive public access to the riverside. The allocated site policies must encourage development proposals to explore opportunities for new, extended, improved and inclusive access to and from nearby waterways. It would also be beneficial to highlight the requirement within Policy Q24 of the Local Plan to provide riparian life-saving equipment as necessary, with regard to Site SE9.

I hope these comments are of assistance.

Yours sincerely

A solid black rectangular box used to redact the signature of Maeliosa Hardy.

Maeliosa Hardy

Planning Consultant

From: Info Norwood Forum [REDACTED]
Sent: 01 May 2024 20:50
To: SADPD
Subject: Submission from Norwood Forum in response to the SADPD Site 18 Regulation 19 consultation
Attachments: SADPD Site 18 Regulation 19 Submission from Norwood Forum 01.05.24.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category

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Confirmation of receipt would be appreciated.
Many thanks
Kim Hart

Kim Hart

Chair, Norwood Forum

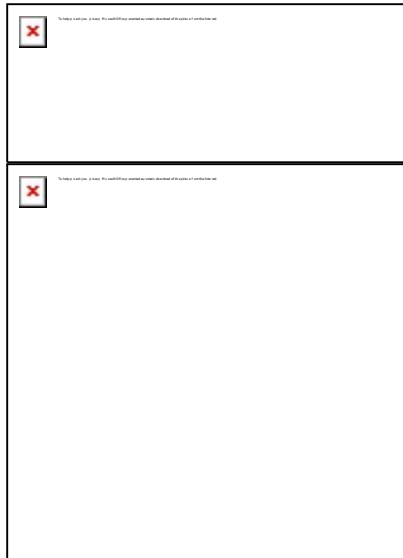
www.norwoodforum.org

We are local volunteers dedicated to supporting a sustainable, vibrant, and creative community by making a positive difference to the quality of life for the people who live, study, and work in Norwood. Keep in touch with the latest news here www.norwoodforum.org/sign-up

Working towards a Greener Norwood

Please share your ideas and concerns with us as we focus on this new project in the coming months:

info@norwoodforum.org





SADPD Site 18 Regulation 19 Submission from Norwood Forum

Norwood Forum writes to object to the submission of the SADPD to the Planning Inspectorate, and hopes that even at this late stage common sense will prevail and the decision-maker (whoever that is) will decide Site 18 should not be included in the SADPD.

Norwood Forum is a volunteer-led organisation covering the south-east area of the London Borough of Lambeth: West Norwood, Gipsy Hill and Tulse Hill. We are a member of the Lambeth Forum Network and work hard to celebrate our wonderful neighbourhood and its vibrant, diverse, but cohesive community whilst making a positive difference to the quality of life for people who live and work here.

We are a member of our local West Norwood and Tulse Hill Community Stakeholder Group and wish to make it clear we are requesting the opportunity to make personal representation to the Inspector as part of that group.

Norwood Forum considers the current version of the SADPD to not meet the four tests of soundness set out in the National Planning Policy Framework, and it to be flawed and not legally compliant because:

1. Sustainable development is not being proposed since the views of the local community were not sought before its preparation or in the light of the huge number of objections made to the 15 December 2021 Regulation 18 version. Council officers state they have relied on carrying out seemingly the absolute minimum consultation required under the regulations and the Council's Statement of Community Involvement. Is there another authority in the land adopting an SADPD which has not held any face to face public outreach (not even an exhibition) but relied on community groups to act as a conduit? Community groups do not have the Council's resources to develop comprehensive ideas and seek a consensus. In our experience, local authorities engage in informal consultation through a suite of measures before proceeding to statutory consultation.
2. The failure to involve the public is compounded in the case of Site 18. The plans for Site 18 are not justified since no public assessment of the relationship of the existing 2017 Masterplan: Moving Forward: A Collaborative Approach to Delivery on which officers say it was based was undertaken and put before Cabinet on either 15 December 2021 or 15 January 2024 when agreeing the Regulation 18 and 19 versions of the document. The Master Plan was worked up in consultation between the Council and the local community, and the Council should have engaged with the community on proposals to update that. This would have created the opportunity for community buy-in to the SADPD. Given the development of the former 'Laundry' site and the agreement to remove the sites with significant residential from the policy (as we sought), some tweaking if not more substantial change was clearly necessary. Two years have been wasted through not engaging with the community. Why, when Lambeth have previously praised the: *'strength and willingness to engage of the West Norwood and Tulse Hill community that has been instrumental in delivering numerous successes for the area in recent years'*, have Lambeth not adequately delivered on public consultation, especially as this is a plan that will change forever the heart of our community? In the responses published on 8 March 2024 officers claim the 2017

Master Plan has been withdrawn, but omit to say by whom, when and under what authority, or explain why this was not publicised. In the same document officers also belatedly claim its findings informed the SADPD but offer no proof; the reality is there is no reference at all to the Master Plan in any of their SADPD reports. Cabinet was therefore misled at both meetings through not having access to this planning history on Site 18 and necessary knowledge of a position agreed between the Council and community. Furthermore, it was not given the opportunity to test the SADPD proposals against the agreed Master Plan 2017.

3. The decision-making process itself was flawed as Wards affected should have been listed to meet the legal and constitutional requirements of the statutory Forward Plan process. The Forward Plan entry (apparently first made in December 2020) for the 15 December 2021 Cabinet key decision specified “All wards” rather than the wards where the specific sites were sited. So for instance, the Council did not ensure that residents of Knight’s Hill ward were notified of the important key decision to be taken about their town centre: possible large-scale demolition and redevelopment. This was compounded by the opaque title used for the Forward Plan entry, and the failure to publish a proper list of background documents: no reference was made to the previous key decisions taken: West Norwood Town Centre Master Plan 2009 (Lambeth Council/EDAW), the A Plan for West Norwood and Tulse Hill: Community Evidence Base Report 2016 (Lambeth Council/Regeneris), and the West Norwood and Tulse Hill: A Manual for Delivery 2017 (Lambeth Council/Regeneris). The officer response published on 8 March 2024 does not address the point we made at Regulation 18 that the SADPD is not a general all borough covering policy document but a site specific set of proposals. The officers double-downed on this legal failure by following a similar flawed notification process for the 15 January 2024 key decision.
4. We also remain of the view that the requirements on Regulation 18 consultation were not met. There was no pre-notification to local communities about the proposals or indeed to the Lambeth Forum Network of which Norwood Forum is a member. Cabinet met and approved the SADPD for public consultation on 13 December 2021. It then took until 6 January 2022 to notify Norwood stakeholders and offer (them only) an online briefing. This was held on the earliest possible date offered by the Council of 24 January 2022. Lambeth states its Regulation 18 consultation commenced on 10 January 2022 and ran until 11pm on 22 February 2022. The stakeholder group, made up entirely of volunteers, was therefore given less than four weeks to activate the community and respond following this briefing. Despite this our community responded by submitting over 3000 objections – 84.2% of all comments made on all the SADPD sites. The officer response published on 8 March 2024 did not adequately address this issue.
5. Officers failed to publish with the Cabinet agenda (15 January 2024) the responses received under Regulation 18. Instead they published a short summary (Appendix 3). This meant Cabinet was not given the opportunity to consider the actual representations made and weigh them up against the responses of officers. Furthermore, Cabinet was misled as the officer summary states for Site 18 “Significant local opposition to principle and scale of development” whereas in fact the community had agreed to the principle of residential development as this was integral to the 2017 Master Plan and predecessors. Norwood Forum and other stakeholders made it plain in their representations that the community did not want a blighted site to remain behind the high street – a position which the Council has failed to address adequately over the decades.

6. Our understanding is the Council is required to provide a response to all points made under the Regulation 18 process. We have read the responses provided to our extensive representations and do not consider some to be adequate as the reasons for the officer viewpoint are often not given. Moreover no responses at all were provided to our representations at sections 6 - 9 (pages 6-13), and we were not contacted to explain why or how our comments were being incorporated or why they were being rejected.
7. Cabinet (15 January 2024) has been potentially misled by comments in para. 2.27. It is not true to state there was engagement with the local community; there was none. There was instead three of "stakeholder engagement meetings" on Sites 18 & 19 with a limited number of invitees by officers. No attempt was made by the Council to convince the 1,300 objectors that the Council's proposals were correct. Also, whilst much existing housing within the original Site 18 boundaries at Regulation 18 has been removed, some has not and this is not spelt out in the paragraph.
At that Cabinet meeting on 15 January, the cabinet member was asked if the Council would engage in public consultation on the Regulation 19 proposals and it was understood that he committed the Council to that. In the event the Council actually proceeded with just one briefing session with the small Stakeholder group.
8. The January 2024 version does not address the fundamental objection that regeneration will likely mean the demise of our existing mix of independent and small chain shops and other local businesses on Norwood Road. There is a complete lack of recognition of the vital contribution our local businesses make to our 15min neighbourhood. They stood by the community during Covid, and our high street thrives because of its unique make-up. We have all witnessed what happens to small businesses when redevelopment occurs:
 - Existing businesses have to close - where do they go, how do they survive?
 - Redevelopment takes years with all that entails
 - The former businesses cannot afford to return, units remain empty, and any that are filled are filled with national chains.

Officers have failed to address this fundamental issue. No protection whatsoever has been offered for our local businesses. They state this is an issue that can only be addressed under any planning application that is submitted, but we want the Council to address this in the SADPD. Moreover, the Council owns the freehold of the B&Q site and should be presenting plans to protect this crucial anchor store which is vital to the continuing success of the town centre.

9. Cabinet (15 January 2024) was advised in para. 2.28 that Site 19 had been withdrawn from the SADPD but the possible next steps by Council were not flagged. We believe the Council should be working now with the community to confirm the future of this site and not standing back and waiting until a planning application is submitted. This is of no help to the community, the businesses successfully operating at the site nor indeed the landowner and would be developers
10. Cabinet (15 January 2024) was not provided with TVIA images of the impact of the tower blocks on site 18. These were only published on 8 March 2024 (Appendix 1 Townscape and Visual Impact Assessment - Views Analysis). We disagree with the subjective commentary accompanying the TVIA images, but this visual evidence should have been presented to Cabinet in making its decisions; Cabinet was not fully informed. It is regrettable too, in the light of views submitted at Regulation 18 consultation, that officers did not use the opportunity of the "stakeholder engagement meetings" to seek agreement to the TVIA image local views to be used to show the impact of the mooted development.

11. The SADPD fails to give sufficient regard to the damage to our local heritage. The current policy for Site 18 states: *'development should respect the rich conservation value and heritage of the town centre, taking account of factors such as building heights ... avoiding a canyon effect'* (Taken from the current Local Plan). The SADPD Site 18 proposal is clearly a step backward as it means:
 - Totally out of scale buildings and a radical redesign of the heart of our town - without any community involvement
 - Overshadowing and domination of the neighbouring properties – the clear creation rather than avoidance of the prescribed canyon effect. This will degrade existing local heritage buildings; for instance the fine parade on the eastern side of Norwood Road: 'The Broadway' from Lancaster Avenue to Chatsworth Way
 - Damage to the setting of St Luke's Grade II* listed church, the existing and mooted extension to [West Norwood Conservation Area](#) and West Norwood Cemetery (one of the Magnificent Seven) - all important heritage assets.
12. The viability assessment dated June 2023 but only published on 8 March 2024 should also have been published with the Cabinet agenda to aid the Cabinet in its decision-making. Again therefore the decisions taken by Cabinet are flawed as Cabinet was not fully informed.
13. Furthermore the Viability Assessment casts extreme doubt over the viability of Site 18. At Table 5.2.1: appraisal results shows a deficit of £46.16m for SA18 (site18). Para. 5.5 states: "SA18 generates a relatively low residual land values (£5.80 million) which is significantly lower than the Site's benchmark land value of £51.96 million. This site contains an extensive number of properties, including residential units. Given the low value generated in relation to the benchmark land value, this scheme would require significant growth in values to become viable". We fear this means it is very unlikely much (if any) affordable housing will be provided by any developer during the lifespan of the SADPD. It would therefore be more sensible for the Council to delete Site 18 and facilitate development of individual parcels of land or contiguous parcels (notably B&Q and the industrial area to the north which is all owned by Lambeth) -as is already happening on the former Laundry site. There could also be encouragement of modest extensions to the existing buildings on Norwood Road and conversion/upgrade of upper floors to residential as is already taking place on both sides of the Lansdowne Hill junction with Norwood Road, to the south of Site 18 as now drawn but formerly within it. There is a real opportunity to work with the community be they residents or businesses and with land owners and developers to provide development that meets the principles we set out in our original representations under Regulation 18. These findings should clearly have been presented to Cabinet for consideration as part of its decision-making.
14. Finally we dispute the Council's claim that proceeding with the Regulation 19 consultation during the pre-election/election period was acceptable. Regardless of the advice they received from Council's Monitoring Officer to the contrary, we suggest at the very least, this was morally wrong, not least because the key Cabinet Member Cllr Adilypour who had been personally involved throughout the process was unable to participate and, though local councillors had been given special dispensation to be involved, with the by-election called in the Knight's Hill ward within which Site 18 is located, none attended the briefing.
 - Government [Consultation Principles](#) specifically state that: *'Consultation exercises should not generally be launched during local or national election periods'*.

- [local.gov.uk](https://www.local.gov.uk) also states that:
'Consultations should be considered very carefully during the pre-election period as it is a period of heightened sensitivity'.

We received no explanation as to why the Regulation 19 process had to be rushed through, after some two years had passed following the Regulation 18 consultation. We suggested the only fair and transparent way forward was for the Regulation 19 consultation period to be extended by at least 7 weeks to mitigate the impact of the pre-election period.

- This will enable planning for the fuller engagement as has been promised.
- Plus enable the proper participation of Cllr Adilypour and local ward councillors.

A positive way forward in collaboration

In conclusion, for all the above reasons, we still call for Site 18 to be removed from the SADPD policy document. We remain pro-development, especially recognising the desperate need for genuinely affordable housing, but as we said as far back as December 2022, we want:

Consultation and engagement with the wider community by Lambeth Council; working in partnership to develop a holistic vision for the whole of West Norwood and Tulse Hill, including Sites 18 & 19.

The community really does want to be part of the solution going forward; to deliver a plan that achieves Council objectives but also fulfils the aspirations of our thriving community of residents and businesses.

Kim Hart
Chair, Norwood Forum
01 May 2024

[REDACTED]

From: Charlotte Ashworth [REDACTED]
Sent: 02 May 2024 10:59
To: SADPD
Cc: Matthew Dibben
Subject: Station to Station BID SADPD Site 18
Attachments: Station to Station BID SADPD site 18.pdf

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Please find attached Station to Station's response to Site 18's inclusion in Lambeth's SADPD.

Charlotte Ashworth
BID Manager

[REDACTED]
[REDACTED] (Mon-Thurs)

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Station to Station
West Norwood & Tulse Hill
Business Improvement District
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c/o Co Accounting, Unit D228, Parkhall Business Centre, 62 Tritton Rd, Norwood, London SE21 8DE



Station to Station BID

Response to Lambeth's SADPD for Site 18

Lambeth's plans for Site 18 will have a transformative - be it positive or negative - impact on West Norwood's town centre and the area as a whole. No other SADPD consultation in the borough will have quite such a huge and potentially devastating effect on the 'beating heart' of a much loved high street. Development of the vacant and derelict land is necessary and could be highly beneficial to the area, but it needs to happen with the consultation and consent of those who will be most affected by it - the business and residential community.

Station to Station, as the BID for West Norwood & Tulse Hill, are looking to collaborate meaningfully with Lambeth on what happens on Site 18. We know that Lambeth needs to build more homes and that West Norwood's Site 18 could potentially accommodate 150 families and other local people, a substantial number in the context of this area. This could be beneficial for the local economy, especially if lines of communication are kept open about the expected demographics of those moving to the area so that businesses can plan and adapt for the new inhabitants.

However, we as representatives of our local business must also be mindful - and make the council mindful - of the potential risks to our community should developers buy up the commercial premises and close existing businesses while they redevelop these buildings.

Unless sensitively handled, this will have a negative effect not only on those businesses directly affected/closed by the development, but also on those businesses nearby, whose current footfall and spend would be negatively affected by customers staying away due to disruption (building work, traffic, noise) or because anchor stores (B&Q, Platinum bakery and 2 x butcher shops) are no longer open. We have seen negative precedents in other neighbourhoods for this; the development of Network Rail /Arch Co premises in both Herne Hill and Brixton for example. This led to lengthy building works that resulted in the closure of much loved independent businesses, hiked rents and long term vacancies in the very core of these town centres, rendering them less vibrant destinations for shoppers.


Moreover, the valuation of the land on Site 18 versus the building costs referenced in the SADPD document, seems to show that currently developing this site is not financially viable. This puts at risk the quota of affordable housing, as well as the need for developers to build tower blocks far higher than local precedents allow. It also increases the risk of blight; with the combined issues of the length of time would-be developers wait for the market to improve, while existing businesses don't feel able to spend money on improvements during this period of uncertainty.

On behalf of the West Norwood & Tulse Hill businesses community, Station to Station BID is seeking a meaningful contribution via a 'seat at the table' in conversations with developers serious about investing in our town centre, and at the EIP into the SADPD document.

We ask that Lambeth, the appointed Inspector and any potential developers guarantee the following:

- Protection of a key anchor store (B&Q) which brings in visitors from outside the local area, and whose customers add footfall and spend to the high street as a whole. We accept this does not mean protection of the existing bricks and mortar but could instead be a modern facility to meet the current needs of an anchor store, rather than those prevailing decades ago when the store was built.
- Protection that will ensure the continued existence of current local independent businesses operating within the two parades of shops within the current 'red line', some of whom have been there for 40+ years
- Small grants and other support to enable improvements to premises rather than their demolition
- Small grants (£2-5K each) for existing/ new businesses returning / moving to the new redeveloped commercial premises
- Business mentoring for new/existing businesses so they can compete and be successful in the new environment, and so they can plan for and capitalise on the change in demographic that any new housing brings
- Temporary premises provision (perhaps via 'boxpark' units while the development happens, preferably within Site 18 or in the nearby West Norwood area)
- Redevelopment to provide small premises (mirroring what is currently available), not large spaces with expensive footprints that only nationals can afford
- Marketing to maintain the footfall to the businesses during the development
- Business rates relief/reductions for the surrounding area in recognition of the financial impact of the business disruption across the whole high street of any redevelopment works (as was put in place when Thames Water did 18 months of mains work on the Norwood Road)
- No compulsory purchase orders for any premises, and free legal advice for businesses who are subletting or on rolling leases so they can be afforded the same protection that other leaseholders/landowners have
- Protection of light industrial workspace - there is a huge demand locally for 'messy, dirty, smelly' spaces (see Avison Young's [West Norwood & Tulse Hill Business Space Demand Study](#), commissioned by Station to Station and Lambeth Council as part of the High Streets For All funding) and we would not like to see this element removed from site 18.

As the BID Manager for the area I would like to state my intention to make personal representation to the Inspector.



BID Manager

Station to Station business improvement district

[REDACTED]

From: Alan Piper [REDACTED]
Sent: 02 May 2024 11:07
To: SADPD
Subject: Site Allocations DPD - Representations from the Brixton Society.
Attachments: BS Site Allocations Apr 24.doc

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Please find attached the representations from the Brixton Society on the Proposed Submission Version of the Site Allocations DPD.

The document is in Word format.

Regards,

Alan Piper,
Secretary, the Brixton Society.

[REDACTED]

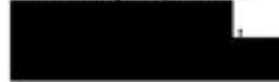
The Brixton Society

Understanding the Past, Looking to the Future
Reg'd. Charity No.1058103, Registered with the London Forum of Amenity Societies
Website: www.brixtonsociety.org.uk

Lambeth Planning,
(Development Management)
PO Box 80771,
London,
SW2 9QQ

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Please reply to:
Alan Piper, RIBA,



Rev. 1st May 2024

Site Allocations DPD – Proposed Submission Version

In response to the recent consultation on the above Development Plan Document, our representations are set out below.

1. Introduction

The Brixton Society was established in 1975 as the amenity society covering the wider Brixton area. We are registered with the London Forum of Amenity Societies, and keep in touch with the Brixton Business Improvement District and Transition Town Brixton. We regularly comment on local plans, policy changes and individual planning applications, and try to promote good practice for the benefit of our area.

2. Scope of Comments

Our particular concerns are sites 17, 20, 21 and 23. We have also commented on site 22 on the eastern edge of our area because any high-rise development would impact on the Loughborough Junction local centre and the Loughborough Park Conservation Area.

Modifications to the DPD have been proposed as far as practicable.

We have measured all building heights above ground level, and assumed an average storey height of 3m, based on the Mayor's Housing Standards requiring a floor-to-ceiling height of at least 2.5m, and ground floor commercial users generally requiring a little more than this.

3. Common Factors

It is essential to plan for the needs of the community as a whole, to ensure that residential areas, new and existing, are provided with a range of amenities and facilities to support urban life, and to balance competing interests in the interests of the wider community.

The current version fails to do this, and so is fundamentally **unsound**.

In particular, this version fails to respond to emerging issues and trends since the current Lambeth Local Plan was adopted in 2021:

- 3.1 Increased **construction costs**, consequent on Brexit and Covid affecting both the availability of skilled labour and the supply of imported materials.
- 3.2 Higher **interest rates** have slowed down speculative residential development. Annual mortgage costs for buyers are 61% higher than 3 years ago, two-thirds of this due to higher rates and one-third due to higher prices (*Zoopla UK House Price Index Report, April 2024*). Existing planning permissions are slower to translate into the actual construction of new buildings.
- 3.3 A crisis of **Housing Affordability**, due to lack of social rented provision and minimal regulation of private rented housing. This bears most heavily on families with children, while new private development has focussed on providing small flats for adult households. Yet there is no shortfall in planning permissions being granted for new Housing development overall, and Lambeth felt able to dismiss suggestions of other sites to be added to the Site Allocations list. (*See also under Section 5 below.*)
- 3.4 Following the Grenfell Tower fire, more stringent **fire precautions** have finally come into effect for residential buildings over 18m, typically 6 storeys high. The crucial requirements are provision of a second fire escape staircase and a fire-fighting lift that can be used to evacuate disabled people. These substantially add to building costs.
- 3.5 The Council's preferred high-rise high-density model will result in **minimal supply of Affordable Housing** from private development. This is because the Council's own Viability spreadsheet allows developers to argue for reduction or omission of any contribution to Affordable Housing on the grounds of higher construction costs. Some restraint of building heights and densities is necessary to achieve any worthwhile contributions to Affordable Housing.
- 3.6 Although Lambeth has declared a Climate Emergency, the implications have yet to be understood by its planners. Public concern at Global Warming from the burning of fossil fuels has been reinforced by higher energy costs in the past few years. Therefore it is more important than ever to encourage building forms that are more **energy-efficient** and do not depend on high energy inputs for heating or cooling. Tower blocks are inherently poor performers in this respect.
- 3.7 In considering the whole-life generation of carbon dioxide associated with a building, it is now widely recognised that the **embodied carbon** dioxide in construction and in any original structures should be taken into account, not just the building's operational energy consumption or transport implications. This strengthens the case for retaining or adapting existing structures, rather than demolishing them entirely and starting afresh.

3.8 It is now a requirement for planning applications to demonstrate **Biodiversity Net Gain**. This supplements earlier requirements within Greater London to consider Urban Greening, in order to slow down rainwater run-off and promote sustainable urban drainage (SUDS). This is incompatible with the Council's high-rise high-density model, so will only lead to "green-washing" where developers will make claims which will not be achieved in practice.

4. Site 17: 330-336 Brixton Road SW9

Soundness: The proposals are not positively prepared or justified. There is no convincing overall vision for this collection of different sites.

The identification of this site for development makes no sense, given the variety of different ownerships and uses. It is not a "soft target" with a single owner or unbuilt land.

It may simply be a hangover from the Council's attempts at "Comprehensive Development" of the areas north of Brixton Town Centre 50 years ago, when Compulsory Purchase Orders were easier to implement, but the world has moved on since then.

Trying to squeeze in housing alongside the existing uses can only be detrimental to their efficiency, particularly for business workspace.

Our detailed comments on the elements within this site are essentially unchanged from the comments previously made in February 2022.

Modifications: Delete the whole site.

5. Site 20: Tesco, 13 Acre Lane SW2

Soundness: The revised proposals for this site are not justified.

The Council planners have disregarded all previous representations except those from the site owners, and instead substantially increased the scale, massing, height and density of the proposed development.

A planning authority that was more professional and honest would give some weight to the great number of local representations made at the Regulation 18 stage.

We are in agreement with the latest representations made by nearby residents including those in Baytree and Porden Roads, Arlington Lodge and Trinity Gardens. We add the following detailed comments:

The sharp increase in the target number of dwellings on this site has not been justified. In its response to proposals for other sites to be added to the Site Allocations DPD, the Council stated: "There is no need for the Council to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021."

Source: Regulation 18 Consultation Report, responding to submissions on behalf of Notting Hill Genesis (R0137, p.135) and Transport for London (R0848, p.162).

In addition, the increase in number of dwellings and reliance on high-rise blocks to achieve this, mean there is little prospect of such a development providing any enhancements in respect of heritage, open space deficiency, air quality, biodiversity or urban greening. The likelihood is that these will be sacrificed to meet unrealistic housing targets.

The indicative diagrams prepared by the Council make no concessions to the most basic principles of urban design or the proximity of heritage assets.

Modifications: In general, we support the modifications proposed jointly by the local residents' groups.

In respect of **building heights**, the Proposed Submission Version (PSV) makes a major departure from the Design Evidence Paper for the previous version (paras 4.6 & 4.7) which indicated a maximum of 32m (9 storeys) for the tallest element in the centre of the site, with lower blocks of 6 to 7 storeys to east and west, and 11m (3 storeys) for the block nearest to Porden Road. Instead, the PSV (page 77) shows the heights of neighbouring properties, but does not indicate acceptable building heights within the site itself. The accompanying text only states that the site is not suitable for "tall buildings" which the Council defines as 45m (15 storeys), which a developer could readily take as the upper limit.

For comparison, the adjacent borough of Southwark defines tall buildings as 30m (10 storeys) or only 25m (8 storeys) in the Central Business District.

Instead of allowing unrestrained development, the proposal map in the DPD should provide more detailed guidance on building heights at a reduced scale, based on 3 storeys closest to neighbouring properties in Porden and Baytree Roads, and no more than 6 storeys on less sensitive parts of the site.

6. Site 21: 51-57 Effra Road SW2

Soundness: Despite recent modifications, the proposals are still unsound.

We welcome the reduction of the site to an area with a single ownership, thus enabling the Mosaic Clubhouse and Unitarian Church to continue. The urgency of replacing Fitch Court has evaporated with the approval last year of replacing its external doors and windows. In any case, the Council's mismanagement of the Somerleyton Road housing development (Site 14) means that replacement sheltered housing will not be available for several years.

Our main concern is the impact of new buildings of **excessive height** on the surrounding sites and streetscape. Page 87 indicates new building heights of 26-29m (9-10 storeys) on the main road frontage, which exceeds the 25m height of the slab blocks opposite on St. Matthew's Estate, which are also set further back from Effra Road. Even for the rear part of the site, a height of 14m (4-5 storeys) is proposed, compared with adjacent houses in Dalberg Road at 9m (3 storeys with pitched roofs) and 8m for Fitch Court to the south. The frontage height should be more consistent with existing buildings on this east side of Effra Road, with lower structures to the rear to reduce adverse

daylight impacts on neighbours and provide some opportunities for including trees and other greener features.

In addition, there should be a stronger steer towards providing the **employment floorspace** in a separate block adjacent to the existing Link Business Centre. Attempts to incorporate it on the ground floor of residential blocks limit the range of businesses which can use such space without adverse effects on the residents above. A separate block could provide for a wider range of activities, including manufacture and those with special ventilation requirements.

The PSV has not acknowledged the **increased traffic flows** along Effra Road as a consequence of the Railton Road LTN. This reinforces the need to limit vehicle access to a single point, and to discourage any reliance on vehicles stopping on Effra Road itself.

Modifications:

(To p.87 map and p.89 text): The height on the Effra Road frontage should not exceed 15m (5 storeys), and for the interior of the site, building heights should not exceed 9m (3 storeys).

The location of the workspace on p.87 map should be identified more clearly, rather than just a grey smudge. Surely the old term “light industrial” is unduly restrictive and could exclude a number of potential business users?

The penultimate bullet point on p.89 is now obsolete and should be deleted.

7. Site 22: Wellfit Street, Hinton Road & Hardess Street SE24

Soundness: Despite recent modifications, the proposals are still unsound.

Our views are substantially unchanged since the previous (Reg.18) consultation more than 2 years ago. The scaling-down of the number of dwellings is helpful, but we are concerned that housing and employment uses are still being squeezed together on a restricted site, to the detriment of residents’ standards of amenity and constraints on business operations and access.

The proposed building heights are grossly excessive in this context, and will result in a cluster of towers having an adverse impact on the setting of the Loughborough Park Conservation Area, particularly when viewed from the junction of Moorland Road and Loughborough Park.

Rather than creating a precedent for high-rise development, the nearby Higgs development actually constrains what can be built on this site, to minimise issues of mutual overshadowing and overlooking.

By its failure to take a long-term view, the Council is sacrificing the last opportunity to safeguard a long-overdue access to the London Overground railway service. This location has the advantage of interchange with the Thameslink service through the existing Loughborough Junction station.

Modifications:

On the Vision Map (p.143 of the PSV) and in the Building Design etc section p.145, the maximum building height should not exceed 30m (10 storeys).

8. Site 23: corner of Coldharbour Lane SW9 & Herne Hill Road SE24

Soundness: Despite recent modifications, the proposals are still unsound.

While the set-back from the existing frontages is welcome, the proposed building height remains excessive. The proposals show a poor understanding of urban design principles. We are re-assured to see that other objectors share our views (*including the Herne Hill Society and R1349, R1364, R1462, R1545, R1732, from Reg.18 Consultation Report, pages 1048-1061*).

Rather than creating a precedent for high-rise development, the nearby Higgs development actually constrains what can be built on this corner site, to minimise issues of mutual overshadowing and overlooking.

The scope for adding employment floorspace is limited within this modest site. In particular, the specific ambition for servicing or yard space in the last paragraph of Land Uses (p.154) is unrealistic and more appropriate to Site 22, so should be deleted.

Modifications:

Delete the last paragraph under Land Uses on p.154 of the PSV.

Amend p.155 (Building Design etc.) to state that Development on site 23 should not exceed 14m above pavement level, based on 3 residential storeys above a more generous ground floor for church (D1) or commercial uses.

9. Conclusion

We make one last request for the Council to withdraw or modify these damaging proposals.

We formally request to participate in the Examination by a Planning Inspector, and to be informed of the outcome.



Hon. Secretary

From: Marian Girdler [REDACTED]
Sent: 02 May 2024 12:44
To: SADPD
Subject: SADPD PSV Regulation 19 Site 18
Attachments: Site 18 Reg 19 final.docx

Follow Up Flag: Follow up
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Categories: Red category

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Please find attached the Norwood Society's Regulation 19 submission.
Please confirm receipt of this email

Regards
Marian Girdler
Chair Planning Sub Committee



THE NORWOOD SOCIETY

The Heritage Society for Norwood

www.norwoodsociety.co.uk

Lambeth SADP PSV Site 18

Regulation 19 Representation from the Norwood Society

The Norwood Society objected to the original draft proposals for the SADPD in February 2022 to both Site 18 and 19. The Statement of Common Ground states that Site 19 has been removed from SADPD, one of the reasons given the “significant local opposition to principle and scale of development”.

Site 18 also had significant local opposition to the principle and scale of development. Although a number of changes have been proposed including the amendments to the site boundary and a reduction in number of residential units and quantum of commercial /community floorspace no significant changes have been made to other development principles. A tall building on the site remains, reduced from 36m to 31m we are told in the responses that it is will only be considered if certain conditions are met. One of our major concerns was that this policy as set out would allow the demolition of all the buildings within the site boundary, this would include the oldest shopping parades in West Norwood circa 1870. The response to our objection (R0228 Vision page 512 Officers response to Reg 18 Representations) on loss of the shopping parades was “only the section of Victorian shopping parade between 300 and 346 Norwood Road will be affected. Victorian shopping parades are exceptionally common across London. Having revisited all the existing buildings for their heritage interest, officers have concluded the examples within the revised site boundary exhibit no characteristics which might deem them to be treated as heritage assets.”

We do not think that the proposals for Site 18 are sound for the following reasons:

Legally Compliant

We do not think that the Regulation 19 consultation is compliant in that it has been carried out within the pre election period (PEP) for the election of the London mayor and Assembly members. Although promised to discuss amendments to Site 18 with West Norwood representatives and at the Cabinet meeting (15.1.24) promised there would be further public engagement and feedback sessions to speak to local residents. Further the Cabinet member was advised not to attend a meeting with senior officers and West Norwood stakeholders because of restrictions on activities required by PEP. Given that this consultation contains controversial matters we consider that it should have waited until after the election or the period be extended to allow for meaningful consultation that includes elected members. As the NPPF states that the plan making system should be a platform for local people to shape their surroundings, we consider that the Council has failed and ignored residents Regulation 18 submissions. The proposed SADPD for

Site 18 could allow the change to the heart of the community forever, residents should have a say.

Positively Prepared

We do not think that the proposals for site 18 have been positively prepared. The potential for demolition of all the buildings within site 18 is not sustainable with the loss of the Victorian core of the shopping centre and with it, loss of all the business. It is not enough to say that “plans for the relocation of the existing businesses on site will depend on the nature and timing of development proposals that come forward” (p 513 Reg 18 responses). There is a lack of recognition of the importance to retain these buildings and the significance these businesses have to the ongoing vitality of West Norwood and the contribution they make to the 15 min neighbourhood.

Justified

The retention of the Victorian shopping parades has been dismissed, as officers consider that Victorian shopping parades are common and the buildings have no exceptional characteristics. They might be common in London but many town centres consider Victorian shopping streets an asset and aim to enhance and refurbish not demolish. The case for retaining these building has been set out in Mark Fairhurst’s (part of the community stakeholder group) submission , as a heritage asset and the negative impact on the loss of retail units/businesses in the town centre and the negative impact on the nearby listed buildings and conservation areas. The proposals should have considered the retention of these buildings as an alternative to total demolition.

The current policy for site 18 in the Local Plan states “the development should respect the rich conservation value and heritage of the town centre, taking account of factors such as building heightsavoiding a canyon effect”. These proposals are a step backwards with the over dominant scale of buildings including a tall building 31m that would be totally out of character of and damage the setting of St Luke’s Church Listed Grade II* the West Norwood Conservation Area including West Norwood Cemetery.

Effective

Given the nature of the site with multiple owners it is questionable if the proposals as set out are deliverable within the timeframe of the plan. This site has been allocated as a development site for at least 13 years and so far only piecemeal development has been undertaken.

Conclusion

The community really does want to be part of the solution to the develop the opportunities this site holds. This is evidenced by the working together of the stakeholder group and the large number of residents commenting on the Regulation 18 consultation. This can only be done through engagement with local residents, groups and ward councillors it will be too late when planning applications are submitted to influence the content and quality of a development if it is following the guidance set out in the SADPD PSV.

We therefore considered that Site 18 should be removed from the SADPD PSV and officers work with the local community to achieve a plan that delivers the Councils objects and meets the need of the local community.

The Norwood Society is part of the West Norwood and Tulse Hill Community Stakeholder Group and wish wish to make it clear we are requesting the opportunity to make personal representation to the inspector as part of that group.

Please confirm receipt of this email.

Regards

Marian Girdler

Chair of the Norwood Society Planning Sub Committee

2 May 2024

From: Samara Milford [REDACTED]
Sent: 02 May 2024 13:01
To: SADPD
Subject: Brixton Tesco

Follow Up Flag: Follow up
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Categories: Red category

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Our Requests To Lambeth Council:

Lambeth Council must show it is listening to the local community and present a new draft of the SADPD policy that:

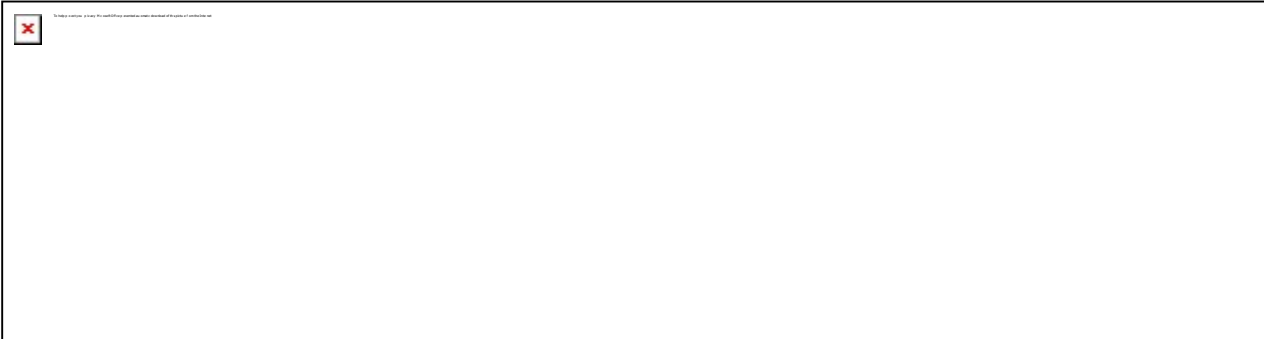
1. **Delivers much needed affordable housing, without unnecessary and inappropriate tower blocks.**
2. **Offers genuinely affordable housing without constructing a massive new development that will overshadow nearby low-rise family homes.** We advocate for low-rise family-sized housing on this site, in harmony with the surrounding area.
3. **Addresses the issue of families leaving Lambeth,** which has caused an education crisis, with local primary schools facing closure or merger. While we acknowledge the Lambeth Plan's overall goal of providing a mix of housing, we believe this site should prioritise family-sized homes due to its proximity to other family residences and nearby primary schools.
4. **Includes green space for new residents.** We want Brixton homes to be desirable and sustainable. The current plans lack green areas and prioritise maximising the number of units, which does not benefit existing or future residents. Only a profit-seeking developer ultimately wins in the scenario that is currently proposed.
5. **Limits the maximum height of the development to no more than 12m (which is still taller than surrounding houses).**

We want new housing on the Tesco site, but we want Lambeth Council to work with us on a sensible and proportionate development. Work with us, not against us!

Our Key Concerns with the Brixton Tesco development proposal are:

1. The plans want to put too many homes (210) in one place, and we're deeply concerned that the land owners/developers might actually want to build more than twice that number!
2. Originally, the council suggested fewer homes, between 120-170. We're deeply concerned that now, based on the proposed calculations, it can almost double that number
3. Even though the plans say the tallest buildings will be 32m high, there's nothing stopping them from being as high as 45m (which is considered very tall). But even 32m is too tall. It would tower above compared to the nearby streets with only 2-3 storey houses.
4. The concerns we raised about how the plans would affect our neighbours, like being overlooked or losing light, have been completely ignored, even though Lambeth has rules about this in their plan.
5. The plans want to change a rule made in 1985, that protects the privacy of people living near the site, to change the current boundary wall height.
6. Parking and pollution is already a big problem around Brixton, one of the highest in London, so it's very important that the new homes don't get parking permits, except for a limited number of people who need them because of a disability.
7. The size of the new buildings would harm the areas nearby that are supposed to be kept special because of their history or beauty.
8. The delivery route for deliveries to the supermarket safely isn't being fixed in the current plans and is currently unsafe.
9. We're missing a chance to build more homes for families, which Lambeth really needs right now, especially since families are leaving and schools are closing.
10. The site will have too many buildings on it, and there won't be enough space for parks or other open areas, even though Lambeth wants to make more green spaces. In Lambeth, Brixton ranks second lowest for tree canopy cover, trailing only Waterloo, often described as a 'concrete jungle'. This deficiency exacerbates pollution issues, leading to heightened health concerns. Moreover, the scarcity of trees and green spaces leaves ample space for the proliferation of housing units, compounding the problem further.

Samara Milford
CYPF Project officer
Black Thrive



[REDACTED]

From: Mike Moon [REDACTED]
Sent: 02 May 2024 13:28
To: SADPD
Subject: SADPD Consultation - MEC London Property 3 Representations
Attachments: MEC London Property 3 Representations SADPD Regulation 19 pdf.pdf

Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category

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Dear Sir/Madam,

Please see representations on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV), that we submit on behalf of our client, MEC London Property 3 (General Partner) Limited, who are the applicants behind planning permission 21/02668/EIAFUL.

Kind Regards,

Mike Moon
Associate

[REDACTED]

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: 020 7004 1700 website: www.dp9.co.uk

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2nd May 2024

Lambeth Council
Planning Policy and Strategy
PO Box 734
Winchester
SO23 5DG

Dear Sir/Madam,

**REPRESENTATIONS TO THE LAMBETH DRAFT SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT –
PROPOSED SUBMISSION VERSION**

SUBMITTED ON BEHALF OF MEC LONDON PROPERTY 3 (GENERAL PARTNER) LIMITED

Thank you for providing us with the opportunity to comment on the London Borough of Lambeth's (LBL) Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) document as part of the Regulation 19 consultation ending on 3rd May 2024. These representations are submitted on behalf of our client, MEC London Property 3 (General Partner) Limited who are the applicants behind planning permission 21/02668/EIAFUL, which received full planning permission on the 9th February 2024 for the following development:

'Demolition of all existing buildings and structures for a mixed-use redevelopment comprising offices, cultural spaces and retail uses with associated public realm and landscaping, servicing areas, parking and mechanical plant'.

The development at 60-72 Upper Ground is of significant strategic importance and will promote significant economic growth for the South Bank and CAZ by providing a new office, retail, affordable workspace and culture ecosystem. The currently under-utilised Site will provide a substantial uplift of economic activity via the provision of over 4,000 operational jobs, 1,700 temporary construction jobs per year, and numerous apprenticeship placements. The delivery of the London Studios on the Site will provide much needed cultural production space for Lambeth-based organisations, whilst the cultural consumption and activation of public space around the Site will introduce a new arts, cultural and digital tech destination on the South Bank, contributing to its vibrancy and character.

Regulation 18 Consultation

DP9 submitted representations on behalf of our client on the Regulation 18 Site Allocations DPD, which queried why the site had been removed from the Site 9 Allocation and requested that it was reincluded due to the fact that the submitted application had not been determined at the time of writing and that if permission were to be granted, there was no guarantee that implementation would take place and the permission could therefore theoretically lapse. The Council's rationale for the exclusion of the site was that at the time of the Regulation 18 consultation, the planning application was at a late stage of consultation



and was set to be determined at planning committee in March 2022, prior to the intended adoption of the Site Allocation DPD, meaning that the aspirations for the site would be addressed by the planning permission and the site as such would not warrant inclusion in the Site Allocation.

Whilst the planning application was considered at planning committee on 29th March 2022, it was subsequently called in by the Secretary of State, and was subject to a Planning Inquiry in December 2022 before the decision to approve the application was published on the 9th February 2024.

In February 2024 the Council published their formal response to the Regulation 18 consultation, stating the following: *‘The adjacent site at 60-72 Upper Ground has been the subject of a recent planning application for major mixed-use redevelopment. Through this application and a subsequent call-in inquiry there were extensive discussions around land use principles which might otherwise have formed the basis for a site allocation policy. The decision from the inquiry, which was published on 6 February 2024, provides a context to determine what is and is not acceptable in terms of parameters for the development of the site. While a site allocation policy would by its nature be somewhat non- specific to allow for different development interpretations within an overall framework, the status of 60-72 Upper Ground is such that the inquiry decision allows more detailed and specific conclusions to be drawn.*

It is not necessary to have a site-specific allocation for every potential development site. Within this context, it is considered that a site allocation policy for 60-72 Upper Ground is no longer necessary and could potentially cause problems with future development of the site if it included elements that proved not to be consistent with the inquiry decision. Relevant elements of the adopted Site Allocation 9 such as the provision of improved pedestrian links between Upper Ground and Queen’s Walk (i.e. in between 60-72 Upper Ground and Princes Wharf) have been incorporated into the proposed site allocation in the SADPD’.

For the reasons set out below, we disagree with the position taken by the Council, and maintain our position that the site should be included within the Site 9 Allocation. Please treat this letter as a formal objection to the draft SADPD PSV.

Representations on SADPD PSV

Having reviewed the SADPD PSV, we again query why the site at 60-72 Upper Ground site is excluded from the Site Allocation, given its strategic importance and potential.

As stated in the previous representations, an important contextual point is that the 60-72 Upper Ground site is included within Site Allocation 9 (ITV Centre and Gabriel’s Wharf), within the Lambeth Local Plan 2020-2035, which was adopted in September 2021. Within the allocation, the preferred use of the site is stated as mixed-use including offices, residential and active frontage uses at ground-floor level.

In contrast to the Local Plan, within Proposed Site Allocation 9 of the SADPD PSV, the boundary is drawn so that 60-72 Upper Ground is excluded, and the allocation is exclusively related to Gabriel’s Wharf and Princes Wharf. In the relevant planning history, it is noted that 72 Upper Ground, adjacent to the site, is subject to a live planning application, with a decision pending. Following the Secretary of State’s decision, this should be amended to reflect the planning permission granted on the 9th February 2024.



The Regulation 18 response from the Council states that the reason for the omission of the 60-72 Upper Ground site from the Site Allocation is due to the specificity of the inquiry decision and planning permission meaning that a broader, less specific Site Allocation wording is seen as superfluous and potentially inconsistent with the inquiry decision. Ultimately the Council maintain their position that the 60-72 Upper Ground site is no longer felt to necessitate inclusion within the Site Allocation as the permission can be implemented regardless of the Site Allocation.

We disagree with this approach for several reasons:

1. At the time of writing, the planning permission is the subject of a Section 288 TCPA 1990 challenge. Whilst the challenge is considered to be wholly without merit, if it were to succeed then the permission would be quashed and the planning application would need to be redetermined by the Secretary of State against the planning policies at the time of redetermination. Clearly in these circumstances the policy allocation for the site should remain.
2. Whilst our client's intention is to implement the planning permission as quickly as possible, the risk of unforeseen circumstances mean there is no guarantee that this will be the case.
3. As matter of good practice, when a large scale redevelopment which would take a number of years to come forward is involved it should still be included as an allocation for comprehensiveness.
4. In the event that the Site Allocation is reduced to solely comprise Princes and Gabriels Wharf, the list of preferred uses will likely result in confusion, and for the sake of clarity there should be consistency both in the site and the list of preferred uses as between the Local Plan and the Site Allocations DPD.

As a result, it is of continued importance that the site remains within the Site Allocation, so that any future development proposals are subject to the appropriate policy guidance and aspirations for the site.

Furthermore, if the Council wishes for the decision on planning permission 21/02668/EIAFUL to guide what is deemed appropriate for the Site Allocation, it should be noted that the Decision Letter (APP/N5660/V/22/3306162) concludes that the 60-72 Upper Ground site is appropriate for tall buildings (subject to defined assessment criteria), not limited to the site of the existing building but also applying to the north of the site adjacent to the Thames. It should also be noted that the Appeal Decision Letter finds that a tall building would not necessarily need to be of 'point block' typology as noted in Annex 10 of the Lambeth Local Plan.

On this basis in the text accompanying the allocation the Council could also note/endorse the findings and conclusions in the Secretary of State's decision letter.

Lastly, it should be noted that the existing permission at the ITV building, on the site itself (17/03986/FUL), for the *'Demolition of existing buildings and the construction of two new buildings (up to 14 storeys and 31 storeys in height with two basement levels) for the provision of circa. 44,434 sq.m of offices (Use Class B1), 3,634 sq.m of television studios (Sui Generis), 216 sq.m of retail (Use Class A1) and 213 residential dwellings (Use Class C3) with associated vehicle and cycle parking, access works, servicing and landscaping.,* has now



lapsed, and is therefore unimplementable. This should be acknowledged within the relevant planning history in the context of the allocation.

Summary

Given the reasons above, we formally object to the SADPD PSV and respectfully request that our representations are considered, and the 60-72 Upper Ground site is reincorporated into the Proposed Site Allocation 9. We would be pleased to discuss the issues raised further with you, and should you require any further information, please contact Mike Moon or Hannah Willcock of this office.

Yours faithfully



DP9 Ltd.

[REDACTED]

From: Carole Milner [REDACTED]
Sent: 02 May 2024 14:29
To: SADPD
Cc: [REDACTED]
Subject: Elders: Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) | Lambeth Council: Consultation
Attachments: SADPD Elders response Site 9.doc
Follow Up Flag: Follow up
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Categories: Red category

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Dear Sir/Madam,

Re: Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) | Lambeth Council: Consultation

Please find attached the response from the Elders Group, Waterloo and South Bank area, with specific reference to SADPD Site 9 (Prince's Wharf/Gabriel's Wharf).

We would be grateful for acknowledgement of receipt.

Thank you.

Carole Milner MBE

[REDACTED]

tel: [REDACTED]

email address: [REDACTED]



SADPD Site 9 (Prince's Wharf/Gabriel's Wharf): Inclusion of Nursing Home option

Response from the Elders Group, Waterloo and South Bank area.

The Elders Group writes in unequivocal support for the option of a nursing home to be included in the Site Allocations Development Plan Document (SADPD) for Site 9. It also writes in support of the responses made by SoWN, WCDG and CSCB regarding this use of Site 9.

We have said all along that we wish to engage constructively on this matter and have tried to do so over an extended period of time including representations at Lambeth Together Care Partnership (LTCP) meetings, the Council's January 2024 Cabinet meeting, and the recent SADPD meeting. At that meeting with Lambeth on 15 April, we were promised a number of clarifications which, if received in timely manner, could have been properly shared with our local stakeholders and would have helped us in our formal response to the Council by 3 May and in addressing the tests of soundness as discussed.

These were not received with reasonable time to fully investigate and engage the community the council exists to serve so this response is necessarily general in nature. This should not be attributed to any lack of interest in this matter, depth of local feeling or desire to address specific aspects raised in the consultation.

As those who are most directly impacted by this issue, we wish to attend the future examination of the SADPD and will make our voices heard at that time.

We wish to make it clear nonetheless that we question the soundness of the Council's proposals against the required tests of soundness: positively prepared, justified, effective, or consistent with national policy. For now, we put forward the following:

- Firstly, we make the clear distinction between a nursing home and other forms of residential care homes. This is not the case in all of the Council's documents and this obscures many of the arguments.
- Lambeth's borough-wide assessment of need for older people's housing is within the Lambeth SHMA 2017. Being seven years old this is surely not an up-to-date assessment of future need, especially with a now-estimated increase of ~50% by 2031 in those in the borough who are over 65 (Lambeth's Market Position Statement 2023-2028). This estimated rise in the older population as well as the rising incidence of illnesses such as dementia would indicate that in 10 years' time there will be no difficulty in filling 76 nursing home beds from our local area without going outside the borough or even our Ward.
- If, as the Council asserts, there is no identified need for a nursing home in our area and there is sufficient provision within our Ward and within the borough, why do we have evidence of local residents being moved to homes at the opposite end of and even completely outside the borough.
- We note the Council's 1075p-long Consultation Report, February 2024. Other than one Tenants and Residents Association (TRA) (Mulberry Housing Co-op) and the four individuals apparently consulted in 2022, none of us is aware of having been included in any of these consultations either as TRAs or individuals. We therefore have to query the Council's assertion that it has sought to "objectively assess" our area's needs.
- We applaud the aspiration to joint working at any level. But surely effective joint working and co-production between the Council, the social enterprise landowner and the local community on such a strategic matter would have achieved, and still would achieve a much more sustainable and inclusive outcome. We have offered this but have had no response.
- CSCB is a social enterprise and not a money-spinning private company. Its proposals have been conceived with the intention of creating not only sustainable but also equitable development with cross-subsidies that will make it possible to offer a high proportion of spaces at local authority rates. The Council's mixed-use proposals for the site may bring in finance in the form of business rates but, other than that, we have seen

no business plan for viable sustainable development, especially when considering the massive amount of mixed-use development already expected in the immediate vicinity.

- The Council has set out its preferred options for this site but these uses are not accepted as either desirable or viable by either the community that lives here or, fundamentally, the landowner itself.
- We have yet to see the Council's suggestions for reasonable alternatives to CSCB's proposals for a nursing home. These are not even evidenced in the Council's most recent Market Position Statement 2023-2028 which makes scant mention of nursing home provision in general ("we are focussed on developing nursing care provision particularly") and none at all for this area.
- Finally, national policy, Lambeth Council's own policies and all current research on vulnerability, loneliness and isolation, assert the critical need to keep older people within their own communities. Whilst the Council has stated its laudable aims of keeping people in their own homes for as long as possible, when we have absolutely no alternative but to move into a nursing home, we have no proof that the Council is doing anything at all to ensure, in line with these policies, that we can remain locally within and close to our own communities.

In summary, our residents wish to be able to continue living in our local community as we age, even when no longer able to live independently. We therefore fully support the wish and need for the inclusion of the option of a nursing home on Site 9 to be included in Lambeth's forthcoming site allocation plan.

The following are all local residents and members or representatives of Tenants and Residents Associations (TRAs) and other residents groupings in the Waterloo and South Bank area including:

Aquinas Street, Blackfriars Surgery Patient Participation Group (PPG), County Hall, Edward Henry Housing Co-operative, Lambeth Links, Lambeth Walk Surgery PPG, LERA (Lambeth Estate Residents Association), Mulberry Housing Co-operative, New Cut Housing Co-operative, Octavia Hill Residents' Association, Palm Housing Co-operative, Pearman Housing Co-operative, Perspective, St. John's Church PCC, Waterloo Action Centre (WAC), Waterloo Health Centre PPG, Waterloo Residents Social, Westminster Square, White House.

They have all given specific consent for their names to be included here:

Georgie Bell	Barry Hetherington	Judy Smith
Pauline Brown	Tim Hollins	Mike Sprinz
Jane Bull	Andy Humphries	Jenny Stiles
Stephen Bull	Michael Johnson	Elaine Thomas
Frank Clarke	Ann Keen	Mike Tuppen
Liz Clarson	Cepta Kelly	Simon Wallace
Paul Cons	Glenn Kesby	Helen Webb
Marie Dove	David Kesby	Max Weiner
Jan Falkingham	Carole Milner	Denise Wiand
Chris French	Pauline Milner	Avivah Wittenberg-Cox
Ken Hamilton	Jenny O'Neill	Mark Wraith
Jeanie Harvey	Mark Ormerod	Barbara Zanditon
Liz Heaseman	Liz Rideal	

2 May 2024

From: Zoe Peet
Sent: 02 May 2024 22:23
To: SADPD
Cc: Cllr Scott Ainslie; Cllr Nicole Griffiths
Subject: SADP Consultation; Reg 19
Attachments: Green Group Response to Lambeth's Site Allocations Development Plan Document 2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Green category

Dear Planning Policy and Place Shaping team,

Please find attached the Green Group Cllrs' response to the [Site Allocations Development Plan Document Proposed Submission Version \(SADPD PSV\)](#) consultation. We have opted for submitting this directly by email over the online form. Please confirm your acceptance.

Regards,

Zoe Peet

Green Group Support Officer

London Borough of Lambeth

Lambeth Town Hall

Telephone: [REDACTED]



**The Mayor of London
and London Assembly
Elections take place
on 2 May 2024.**

You now need Photo ID to vote at a polling station. To find out what photo ID is accepted and how to apply for a free Voter Authority Certificate, go to [Lambeth.gov.uk/vote](https://lambeth.gov.uk/vote)

Lambeth

Response to Lambeth's Site Allocations Development Plan Document

Introduction

The Green Group last submitted a response to the Site Allocations Development Plan (SADP) in its draft form in 2022. Since then, there have been significant updates to local and national policy frameworks, particularly in the areas of climate mitigation and sustainable development. Additionally, the housing crisis has become more severe, with more households in temporary accommodation by thousands each year.

The current version of the SADP has not kept pace with minimum standards in environmentally responsible development or the urgent need for social housing. The policy framework upon which it rests is unsound. Therefore, many of our previous objections to the SADP still stand. Considering Lambeth acknowledged a Climate Emergency in 2019, the Green Group is disappointed to see that the council is missing yet another opportunity to embed the strongest possible environmental standards within its policy-making.

Our recommendations below would bring the SADP in line with the most current guidance and strengthen its intent to ensure Lambeth's growth is not at the cost of environmental harm or further housing inequality.

Greens Cllrs request to attend the Examination in Public following this consultation.

Climate Emergency

This is not a planning document and does not meet the aspirations or requirements set out in the National Planning Policy Framework (NPPF) and London Plan (LP) to significantly reduce carbon emissions in the development process. The statement (1.2) that "applicants should be mindful of the Climate Action Plan" is insufficient in meeting prioritising emissions reduction outcomes. We have set out our concerns as to the soundness of this SADP with proposed changes which should apply to all sites included in the document.

Circular economy

Embodied carbon within building materials accounts for 28 - 40% of a development's whole life cycle carbon emissions. Therefore, developers must take all possible measures to retain existing structures to minimise a project's CO₂, including a pre-development audit which surveys existing buildings and demonstrates that retaining them would generate more carbon

than demolition and development. This is outlined in the LP's Circular Economy Statement Guidance

The SADP makes no reference to this guidance or to retrofit. All "Energy and sustainability" site proposals should include a requirement that retaining, retrofitting or extending existing built structures must be prioritised over demolition and rebuild in conformity with the guidance.

Additionally, The SADP makes no requirement that a pre-redevelopment audit is undertaken to assess options. The LP guidance states:

"4.6.2. A pre-redevelopment audit is a tool for understanding whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new development. The audit should be carried out early on (at pre-application stage) and should inform the design.

4.6.3. If there are existing buildings on a site, a third-party, independently verified or peer-reviewed pre-redevelopment audit is strongly encouraged, including analysis that fully explores options for retaining existing structures, materials and the fabric of existing buildings into the new development; and the potential to refurbish buildings before considering substantial demolition.

4.6.4. Applicants should complete and submit a pre-redevelopment audit as supporting evidence to their CE statements, where a robust in-depth assessment has not already been

Most sites have a very varied arrangement of buildings and we recommend inserting a requirement that a pre-redevelopment audit should be carried out prior to the site allocation (SA) policy being adopted. Alternatively, the SA policy needs to be sufficiently flexible to reflect the range of outcomes resulting from a pre-redevelopment audit.

We also propose that the context section of each site SA contains a clear description of all existing development on each site and any knowledge of its condition and potential adaptability, as well as reference to their potential retention. This information should critically inform the Vision and Policy sections of each SA. Failure to include such an approach contributed to the dispute over 72 Upper Ground and subsequent call-in by the Secretary of State.

Biodiversity

Changes to the *Environment Act* which require developers to achieve a 10% net gain to biodiversity are now in force. The language used in the SADP - "A Biodiversity Net Gain of at least 10% will be expected" - is not strong enough to communicate the mandate. The wording

¹ Greater London Authority, "Circular Economy Statement Guidance". March 2022, https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

² Greater London Authority, "Circular Economy Statement Guidance". March 2022, p. 24 https://www.london.gov.uk/sites/default/files/circular_economy_statements_lpg_0.pdf

³ Environment Act 2021, s 14, <https://www.legislation.gov.uk/ukpga/2021/30/schedule/14/enacted>

should be changed on every site to “is required by statute” to ensure developers are aware of their obligations.

Whole Life Cycle Carbon

The Greens welcome the inclusion of the LP’s Whole Life Cycle Carbon Assessments (WLCA) policy. However, we recommend the SADP be amended to be more explicit in its conformity with WLCA to strengthen the policy’s intent. We propose changing the wording from “Whole Life Cycle Carbon Assessments should be followed” to “must be provided in the form set out in the LP guidance”.

We also recommend emphasising the WLCA’s guidance that all new developments must explicitly and rigorously explore a retrofit option before designing for demolition and redevelopment as a last resort. Lambeth must be applying these principles for new development at the earliest possible opportunity with developers and their consultants at the initial stage of conception for the planning application process. Officers should be explicitly advising applicants that the borough would view a true low/zero carbon proposal as more conclusive to gaining a permission. At minimum, the pre-application advice should be making this clear before a final design is even submitted. At the application stage, Lambeth’s officers and the planning department must gain expert advice to rigorously check the WLCA’s and sustainability credentials of each application.

The Greens would also like to include a specific requirement that low carbon building materials are used wherever possible and incorporated in WLCAs. Concrete and steel are materials with high embodied CO2. Alternative products, such as hempcrete and Cross Laminate Timber (CLT), which actually sequester carbon, should be prioritised at a policy level as well as in the pre-app and application process as an additional carbon-saving design consideration.

Tree Canopy

The SADP makes no reference to Lambeth’s Urban Forest Strategy 2023-30, which sets out goals of increasing canopy cover to 20% and enforcing CAVAT for tree loss and damage as a result of [REDACTED]. Additionally, the document references the target score for Urban Greening Factor (UGF) but does not clarify the developer’s obligations to achieve it.

Therefore, we recommend that all “Urban greening and trees” segments are re-written

- a. to specify that developers must meet the LP’s UGF targets, and
- b. [REDACTED]

[REDACTED]

Housing

The quantity of homes and homes at social rent in the SADP are lacking in accordance with recent national policy developments and demand in the borough. The Secretary of State announced in February that he was dissatisfied with progress on house building, particularly in London, and that he would consult on changes to planning policy to give greater weight to housing development on brownfield sites⁶. The consultation ended in March⁷ and the final changes to policy are imminent. In the light of this context and the imperatives of the LP, the SADP should be seeking to maximise residential properties on all the mixed use brownfield sites identified. The Reg 19 SADP does not do so, for example at Site 1, and is therefore unsound.

Additionally, the number of proposed homes from the 2022 SADP draft has drastically reduced. Appendix 1 contains our comparison of the 2022 version to the 2024 document which shows a drop from 1849 to 969 total proposed homes. This indicates that policy intent has been overridden by planning objectives and proposed housing, particularly social housing, has not been appropriately protected. Greater effort needs to be made to maximise site opportunities for homes at social rent and reinstate the 880 homes lost from the 2022 document.

Site-specific recommendations

Rationale for allocation of sites

The rationale for the sites included and excluded from this SADP as set out at 1.12 - 1.14 is unsound. There are a number of sites which fulfil these requirements which have not been included, such as Waterloo Station Masterplan. This exclusion means it will not be properly tested or embedded in planning policy.

Similarly, the development of 250 homes accommodated in tall buildings on Woodgate Dr in Streatham Vale is not included. This originally came forward in 2020 and is currently proposed for a very controversial approval in an area unknown for tall buildings. The exclusion of such sites undermines the objective of the SADP. We are not suggesting that every possible site is included which might meet the objectives set out at 1.12 - 1.14, but without such obvious sites' inclusion the document is incomplete.

⁶ Department for Levelling Up, Housing and Communities, "Build on brownfield now, Gove tells underperforming councils", 13 February 2024, <https://www.gov.uk/government/news/build-on-brownfield-now-gove-tells-underperforming-councils>

⁷ Department for Levelling Up, Housing and Communities, "Strengthening planning policy for brownfield development", 26 March 2024, <https://www.gov.uk/government/consultations/strengthening-planning-policy-for-brownfield-development/strengthening-planning-policy-for-brownfield-development>

Site: 1 Royal St

Circular economy: The site has two major 1960s concrete residential buildings and one large/tall concrete/steel/glass office building. They are all basically sound and architecturally revered, as witnessed by the C20th support for their retention. Their retention, retrofit or extension should be the starting point for consideration of this site. There are large areas including car parks of the site without buildings which could be more intensively developed to optimise the site. We support the recommended retention of the one-storey Victorian school buildings and 10 Royal St for heritage reasons, but request Lambeth apply similar rigour to minimising the carbon impact of developing this site.

There is no analysis of the existing accommodation and buildings. In order to be in conformity with the LP Circular Economy guidance, we make the same aforementioned recommendations to prioritise retaining, retrofitting or extending existing built structures and that a pre-redevelopment audit should be carried out prior to the SA policy being adopted.

Urban greening and trees: The text is insufficiently robust and thereby ineffective and unsound. The proposed development would implement completely inappropriate pruning and tree root protection to a row of 14 Victorian plane trees with TPOs, which is likely to result in their diminishment or demise. We recommend replacing the word “should” with “must” throughout the paragraph.

Housing: There is an imperative to achieve more housing on brownfield sites in mixed use, as well as an imperative in Waterloo to achieve more affordable housing. Given the very high land costs in this area this is difficult to achieve, except where public bodies, charities or communities already own land which is developable for this purpose. The landowner in this case is a charity tied to a major public body, St Thomas’ Hospital. The site currently has 129 homes on site. Redevelopment should be seeking a considerable addition.

A permission was granted on Appeal to the landowner in 2007⁸ for a mixed use development including 641 homes, with 50% affordable homes for key workers. These would be accommodated in buildings up to 8 storeys with much lower development south of Royal St. It is clearly possible to achieve a considerable uplift in residential on this site. The Reg 19 SADP is unsound in that it fails to meet current planning policy on this matter. Since the site is owned by a charity (GSTF) wholly committed to supporting a public body (GSTT), the site should be considered public land and the higher requirement of the LP for 50% affordable housing should be applied. A description of this permission should also be included in the context section of the SA.

⁸ Application references 05/01168/FUL & 05/01169/CON

Site 2: St Thomas' Hospital

Housing: As per above general comments, the site is suitable for some key worker residential accommodation.

Urban Greening: Much of the site is open in aspect with only buildings at Gassiot House and the A&E entrance and ramps. This open space is mostly green and provides a valuable green break in the urban landscape. Policy which enables the absolute loss of this greenery is unsound. The policy must require retention of as much existing green space as possible and/or its replacement in a new development, with no net loss of green space or open space and a 10% increase in biodiversity.

Site 8: Stamford St

Housing: This site has been vacant for over 40 years and in the possession of a 'community' company. They received it from the GLC at a heavily discounted rate in 1984 along with other sites (including site 9) in order to develop 400 social homes plus accommodation for local SMEs, shops, a pub and open space. The company has only delivered 220 of these social homes. It does have permission for 300 market homes on a nearby site at Doon St, which would support the construction and maintenance of a swimming pool and community leisure centre on the same site. Adjacent to the site is the largest purpose-built community centre in Lambeth.

The site should be primarily for social housing, not market housing, and we are informed could accommodate up to 50 homes. Local campaigners are currently opposing permission for a temporary nightclub.⁹

Urban Greening: Development on this site should not overshadow the valuable green space within the Iroko development to the north.

Site 9: Gabriel's Wharf

Housing: This site has been vacant as a result of the same circumstances at Site 8 above. Lambeth and Southwark Council have between them approved around 4.5m sq ft of offices in the immediate area in the past 3 years including neighbouring 72 Upper Ground, 20 Blackfriars, Elizabeth House and Royal St. None of these have materialised and several of those sites have been vacant for decades. It would be unsound for Site 9 to have policy encouraging yet more speculative office development. The Vision should require affordable housing above shops, cafes and cultural uses at ground floor.

Height: The site faces directly onto the Queen's Walk and river where, according to the LP, anything over 25m is considered a tall building. It would be inappropriate for anything over 25m

⁹ Application reference 17/03658/FUL

opposed to the stated 45m on this site, which is identified as an unsuitable location for a tall building.

Waste Management: Being adjacent to the Thames it is imperative all construction waste and materials are transported via the river. The developers at 72 Upper Ground have not prioritised the river and will likely cause significant congestion and air pollution with large volumes of waste removal trucks. This was approved by the Inspector in the recent public inquiry under current policy. Therefore, the policy wording on Site 9 needs to be strengthened from “should” to “must”.

Site 7: Kennington Lane/Dugard Way

Uses: The current uses are industrial/builder’s merchants, community uses and medical services. All of the industrial uses in and around the Elephant & Castle have been lost to the development of housing across the Opportunity Area. Although the intensification of the site through mixed use development would be consistent with the approach in the LP, it is essential that the existing light industrial capacity is significantly increased. This should be achieved in conjunction with maximising opportunities for affordable residential properties taking precedence over any potential affordable workspace.

Height, massing: The proposed height and scale of this development as illustrated in the evidence base document would impact on daylight and sunlight in many surrounding residential properties where buildings are 9m - 20m in height. A mid-rise development would not have a negative impact.

Site 18: 300-346 Norwood Rd

Context & Vision: This is a collection of sites which provide a large amount of industrial ‘back office’ and large retail floorspace supporting essential elements for a thriving high street and servicing a successful village accommodating over 20,000 households. Residents can access convenience and comparison goods and fresh food within walking distance of their homes. In some ways West Norwood is Lambeth’s best coherent 15 minute city.

The site is described negatively in the context section as “a series of unrelated plots and dead-end routes”. In fact, it is a typical collection of useful anchors and necessary parts of a retail centre - including a large B&Q anchor store with car parking on the roof, a petrol station, small light industrial workshops and car mechanics. As such, rents are relatively low. There is a very real risk that the overall objective, to sustain and improve the vitality and viability of the shopping centre, could be lost through the uplift in land values due to the intensification envisaged in the SADP. It is therefore unsound by not being consistent with NPPF and does not enable the delivery of sustainable development.

Due to the fragmented range of sites and landowners, improving this part of the high street without full buy-in from stakeholders would prove most unlikely. In 2017 the active Norwood

Forum, consisting of residents and businesses, worked with the local authority to develop the West Norwood and Tulse Hill Masterplan: Moving Forward: A Collaborative Approach to Delivery as referenced in the SADP Reg 18 consultation report. In failing to engage with the community and acknowledge the objectives and aspirations of stakeholders in the area as the prime purpose of this Masterplan, this policy is unlikely to be deliverable and is therefore unsound.

The local authority has significantly altered Site 18 and amended the site boundary, reducing homes from proposed 390 - 470 to 150 - 170 units. This is in addition to abandoning nearby Site 19, which would have provided 400 - 430 homes. The amount of commercial floorspace on Site 18 has reduced from 5,000 - 7,000m² to 3,000 - 4,000m², including at least 1,123m² light industrial workspace (to achieve no net loss of existing industrial floorspace capacity).

Land use: It is vital for the high street that the existing major retail operator remains. The policy should not propose any diminishment of size of unit or access or a form of development which would create a significant increase in rent. In cases of intensification, LP Policy E7 requires, where such processes are identified in the Local Plan process, that

*“(1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24- hour access and operational requirements
(2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied”*

The policy is unsound in that it is not clear from the SADP that protecting the high street's industrial and commercial uses takes priority over achieving housing, and thereby the objective met. The danger is that the much higher land values for residential will drive redevelopment to the detriment of the other uses and the vitality and viability of the shopping centre.

Circular economy: There is no analysis of the existing accommodation, some of which is less than 30 years old including B&Q building. In order to be in conformity with the LP Circular Economy guidance, we make the same aforementioned recommendations to prioritise retaining, retrofitting or extending existing built structures and that a pre-redevelopment audit should be carried out prior to the SA policy being adopted.

Site 22: 1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24

Housing: The number of homes recommended for the site has been reduced from 70 to 90 self-contained homes to 50 to 70 self-contained homes, compared to the proposed 320 bedsits. The reduction in homes is typical for other sites across this document and should be reviewed to reflect LP and borough strategies to increase social housing supply.

Height: Despite the height of the Higgs Yard development, residents still have concerns about tall buildings adversely affecting the character of the area as per LP policy 7.7. Therefore, the maximum building height should be reduced in all areas to 25m from 45m.

Traffic: As the SADP states, Hardest Street generates significant traffic and policy should be explicit in ensuring road safety in the vicinity of Herne Hill road. Again, we recommend replacing “should” with “must” to influence design-led approaches to traffic mitigation. The speed of traffic currently endangers school children, patients at the GP practice and residents going to Ruskin Park and Loughborough Junction station.

Site 20 Tesco, 13 Acre Lane

Context and Vision: The principle of intensification through redevelopment of this Brixton Town Centre site is supportable, but the details are misguided. There have been two similar projects in Lambeth, the Nine Elms Sainsbury’s redevelopment and the Tesco Kennington Lane redevelopment. Both redevelop relatively new large supermarkets and car parks. The key difference is that they are in or close to the CAZ, with Nine Elms within the VNEB OA, a location for a cluster of tall buildings. While intensification through redevelopment of the large open air car park within the town centre is good, it cannot reach the sort of scale in the two examples cited without causing irreparable damage to the townscape of Brixton and its heritage assets.

There has been a huge negative response to the Reg 18 proposals in terms of proposed height, bulk and massing envelopes, yet the Reg 19 version has increased significantly in scale. The projected number of homes has increased from a range of 120 - 170 to 180 - 210. We are concerned the housing target is being inappropriately enlarged at this site to offset the overall volume lost as identified in Appendix 1. We would recommend a design-led approach to housing provision at other sites identified in this response.

Height and massing: The surrounding streets are 2 - 4 storey buildings with a maximum height of 19m. The location is not identified as suitable for tall buildings, but the limit for tall buildings has been redefined uniquely by Lambeth as below 45m. Comparatively, the LP and adjoining boroughs such as Southwark define this as 30m. The Reg 18 evidence base indicated a maximum height of 32m, but this Reg 19 SA is silent on the height envelope, implying that anything up to 45m is acceptable subject to other tests.

This would be a disastrous approach as it encourages speculation, beginning with an inevitable hike in the land values which will, in turn, make affordable housing less viable. Therefore we submit this policy is unsound in its potential to be counterproductive and ineffective. A maximum height of 30m should be appropriate at agreed key points within the site where the impact on townscaping, heritage and daylight of adjacent neighbours could be kept to a minimum.

Open Space: The site is within an area deficient in access to open space. The site currently performs in some ways like an open space, in that the large car park is a break in the urban realm. It is essential that the development provides significant quantities of green open space

within the site boundary for the benefit of the substantial number of new residents, including child playspace. This should be visible from the road, which suggests a courtyard design to maximise the number of homes rather than a taller building. The illustrative design in the SADP evidence base exemplifies the fundamentally wrong approach to the master planning of the site.

Site 21: 51-57 Effra Road SW2

Context and Vision: Rush Common provides an opportunity to make this a very pleasant green boulevard with significant biodiversity net gain. Currently, the west side is a coherent design of the set back St Matthews estate, but the east side is incoherent and is an opportunity for a mixed use development with the retention of retail and/or light industrial at ground and the introduction of housing above. The site boundary has been altered from the Reg 18 proposals, and the amount of residential accommodation has reduced considerably, from a maximum of 240 to 95.

Land use: Large local retail spaces like this are being lost across London. The nearest collection of similar buildings along the Old Kent Rd are all being redeveloped within a new OA. These large retail spaces are a key element not present in lesser sized town centres and in providing this type of unit they serve Brixton well. It is vital that Brixton continues to provide this type of retail: the alternative is a reliance on unsustainable out-of-town retail parks. It is inconsistent with other policies in the LP, including the role of Brixton town centre in the hierarchy of town centres, and on this basis the policy is unsound. The policy should require a re-provision of at least one of the large units currently on the site as retail, as well as the light industrial proposed.

Site 17: 330-336 Brixton Rd

Context and Vision: This site contains a large and significant brutalist building worthy of retention, a petrol station worthy of intensification through redevelopment and other buildings due consideration. With no commonality between them, there is no convincing overall vision for this collection of sites.

Circular economy: There is no analysis of the state of the fabric of the existing accommodation. The large brutalist building in particular lends itself to retention and any replacement is unlikely to be significantly larger, simply resulting in an unnecessary and unacceptable volume of carbon emissions. In order to be in conformity with the LP Circular Economy guidance, we make the same aforementioned recommendations to prioritise retaining, retrofitting or extending existing built structures and that a pre-redevelopment audit should be carried out prior to the SA policy being adopted.

Councillor Nicole Griffiths & Councillor Scott Ainslie
Streatham St Leonard's Ward
2 May 2024

Appendix 1

Housing figures calculation

	2022 Max Homes Proposed	2024 Max Homes Proposed
Waterloo		
Site 1 Royal St	129	129
Site 2 St Thomas'		
Site 8 Cornwall Rd	40	30
Site 9 Gabriel's Wharf	30	30
Kennington		
Site 7 Wooden Spoon House	145	125
West Norwood		
Site 18 Norwood Rd	470	170
Site 19 Knollys Triangle	430	
Brixton		
Site 20 Tesco	170	210
Site 21 Effra Rd (Halfords)	240	95
Site 17 330 Brixton Rd	75	70
Herne Hill		
Site 24 King's College Hospital		
Site 23 Coldharbour Lane/Herne Hill Rd	30	40
Site 22 Hinton/Hardess	90	70
Streatham		
Site 3 Leigham Court Rd car park		
TOTAL	1849	969

[REDACTED]

From: [REDACTED]
Sent: 03 May 2024 09:56
To: SADPD
Cc: [REDACTED]
Subject: Site 7 (Kennington) of Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) | Lambeth Council.
Attachments: 20240503_Stop The Blocks Community Action Group Response to SADPD (Final).pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category

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Dear Lambeth Planning Policy Team

We are writing on behalf of Stop the Blocks Community Action Group, in relation to the current consultation on the Site 7 (Kennington) in [the Site Allocations Development Plan Document Proposed Submission Version \(SADPD PSV\)](#). Regrettably as we set out in our letter attached, we do not consider the SADPD PSV for Site 7 to be “sound” and it fails three of the four tests as set out in paragraph 35 of the National Planning Policy Framework (NPPF). We have set out where the shortfalls are on the three tests.

As this is the final stage of consultation prior to the Examination of the document, we would be grateful if you ensured this document is recorded as being received and confirm it has or will be submitted for further examination and the consideration of the Planning Inspectorate.

We look forward to hearing from you.

Kind regards
[Stop the Blocks Community Action Group](#)





www.StoptheBlocks.org

3 May 2024

London Borough of Lambeth
Planning
PO Box 734
Winchester
SO23 5DG

sadpd@lambeth.gov.uk

Dear Sir/Madam

Draft Lambeth Site Allocations Development Plan Document (SADPD)

Proposed Site Allocation 7

Stop the Blocks Community Action Group (STB) support the principle of redevelopment of the Jewson/Wooden Spoon House site to provide new homes. However, the proposal must relate to the site's context and surroundings and be acceptable in all planning matters. New development must make a positive contribution to the area, not adversely impact the existing community's amenity and not impact on the special and safeguarded heritage assets unique at this location. A proportionate, considered development that fits with the surroundings is something that STB would support. This proposal is not appropriate for the site.

Plan test of soundness

In accordance with the NPPF, paragraph 35, plans are required to be:

(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

(d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

We have no comment to make on part a).

(b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence

We do not consider that the proposal is justified for the following reasons:

Alternatives have not been considered.

The supporting information gives no indication that a lower rise, higher density development has been considered.

The Site 7 site is approximately 0.65 hectares. The draft DPD policy indicates a minimum of 115 to 125 self-contained residential units. This would give 208 dwellings per hectare at 125 units. The following assessment is based on those figures.

As set out above, it has been clearly identified in the appeal for the Woodlands site (Appeal Decision APP/N5560/W/20/3248960, paragraph 28), that the area immediately to the east of the appeal site within the London Borough of Southwark sits in a part of the OAPF that “*does not support the development of tall buildings*” as it is within the Pullens Character Area and that the tall buildings within the OAPF that are either built, under construction or approved are predominantly in the Central and Heygate Street Character Areas of the OAPF.

More relevant precedent of lower rise but still dense developments are the developments, in the London Borough of Lambeth, at Knight's Walk and 130-138 Newington Butts and, in the London Borough of Southwark, The Manor Place Depot development.

The development in Knight's Walk (17/05992/RG3, approved in 2019), the first phase of which has been recently completed, is immediately opposite the junction between Dugard Way and Renfrew Road, is a Homes for Lambeth (Lambeth Council's own development company) development of 84 residential flats in blocks of up to seven storeys, with associated parking, landscaping, access and ancillary works on a site of 0.39 ha. It should be noted that the site is adjacent to an existing medium rise building in the form of the six storey Gilmour Section House (see Figure 1).

The ratio of residential units to site area on the Knight's Walk development (215 dwellings per hectare (dph)) compared to the plan proposal of 208 dph, would appear to demonstrate a lower rise scheme (up to seven storeys) accommodating the target number of residential units, whilst still having a reasonable set back from the Water Tower development, would be possible on Site 7.



Figure 1: Knight's Walk development for Homes for Lambeth is a good example of the type of low rise but dense development that could be achieved on the Woodlands site.

Figure 1 is taken looking from the location of gates on Dugard Way. The narrow road access via Dugard Way to the Water Tower development due to the parking bays on both sides of Dugard Way should also be noted.

The development at 130-138 Newington Butts (12/00054/FUL), also including the addresses 2 Kennington Lane and 1 - 9 Holyoak Road, consists of 73 residential units together with the ground floor gym use on a 0.23 ha site fronting Newington Butts, immediately adjacent to Site 7. The site also backs on to the Water Tower development and existing low-rise properties on Holyoak Road. The development steps back in height from 6 storeys on the main road to 5 storeys opposite the Water Tower development, with two 3-storey townhouses at the most immediate interface with the two storey homes on Holyoak Road (see Figures 2 and 3). This development has a 32m separation distance between it and the existing Water Tower development homes.

The ratio of residential units to site area on the 130 – 138 Newington Butts development (317 dwellings per hectare (dph)) compared to the plan proposal of 208 dph, would appear to demonstrate a lower rise scheme (up to seven storeys) accommodating the target number of residential units, whilst still having a reasonable set back from the Water Tower development, would be possible on Site 7. It should also be noted that there are no residential units on the majority of the ground floor of this development in order to provide for a retail unit, servicing and limited parking. This would be a good read across to the industrial and community space that Lambeth is keen to include, thus providing evidence that the density is still possible, including providing for these other uses, without a tall building.

I would note that sunlight and daylight information for these properties was also omitted from the supporting report, despite as can clearly be shown in Figure 3 below, the 'gap' between the 130 -138 Newington Butts block and the 1 - 9 Holyoak Road block being infilled by the proposed development.



Figures 2 and 3: Two views of the 130-138 Newington Butts development, SE11, located within Lambeth and immediately adjacent to the Water Tower development (figure 2 is the elevation fronting A3 Newington Butts and Figure 3 is the elevation fronting Holyoak Road. This is another good example of the type of low rise but dense development that could be achieved on the Site 7 (and includes two town houses on the right of the picture)

The Manor Place Depot development (Figure 4) in the London Borough of Southwark (15/AP/1062, approved in 2016) is approximately 600m to the southeast of the Woodlands site and **is located within the Elephant and Castle Opportunity Area**. The site is located in an “urban” area similar in nature to Site 7 in that it has a mix of two storey houses, some 4 to 5 storey buildings, including the Pullens estate referenced in the E&C OAPF policy quoted in paragraph **Error! Reference source not found.** above, and some higher buildings of between 8 and 10 storeys in the vicinity.

The Manor Place Depot development also contains two Grade II listed buildings including 17-21 Manor Place (former Coroner's Court) and Manor Place baths buildings. The Manor Place Depot development consists of 270 residential units over an application area of 1.7 ha. However it should be noted that the site is bisected by a four track railway viaduct (approximately 0.24 ha) and includes the former Manor Place Baths (approximately 0.17 ha) which do not provide any residential accommodation. This amounts to a developable area of approximately 1.29 ha.

This provides a development of 209 dwellings per hectare, whilst still providing a significant amount of useable amenity space. However, unlike the Lambeth proposal for Site 7, the buildings only range from 2 to 6 storeys in height and are sympathetic to the existing listed buildings on site, reusing them, and, in the case of the former Coroner's Court, fully integrating it into the development, whilst not over-powering these listed buildings.

The ratio of residential units to site area development (209 dwellings per hectare (dph)) compared to the plan proposal of 208 dph, would appear to demonstrate a lower rise scheme (up to seven storeys) accommodating the target number of residential units would be possible on Site 7.

Height not appropriate to the character of the area

The character of the surrounding area is low-rise 2-3 storey buildings. The tallest immediate building is 5-storeys within the existing Water Tower Development. This proposal for a tall building of sixteen plus storeys is not in character with the surrounding area. This proposal will tower over the area making it incongruous and out of character.

The proposal does not respond positively to its locality and historic character in terms of the existing urban grain or local height and massing. Therefore, it does not accord with Lambeth Local Plan Policy Q5: Local Distinctiveness.

Daylight and Sunlight impact is not acceptable.

The proposal will impact the daylight and sunlight of existing homes. The supporting report indicates that Vertical Sky Component (VSC) for many of the surrounding homes will be significantly reduced, many below the BRE Guidance of requiring all existing rooms to have a retained minimum VSC level of 27%.

Negative Impact on Heritage Assets

The sixteen plus storey tower is close to the Grade II listed Old Fire Station and Old Court House. This means it would have a negative impact on the listed buildings. The Renfrew Road conservation areas will also be negatively impacted by the development. It is not considered that the public benefits outweigh the harm to these heritage assets. The

protection and preservation of heritage assets are afforded great weight. The NPPF is clear at paragraph 208 that the harm to heritage assets should be weighed against the public benefits. In this situation, the numerous reasons for a refusal and the limited number of public benefits means that the harm to heritage assets is not considered acceptable.

Inappropriate layout, bulk, and massing

The layout, bulk and massing of the development is not acceptable. It is too tall, too bulky, located too close to existing homes. The development will lead to enclosure, overlooking and overbearing of existing surrounding homes, gardens, and open spaces. Therefore, the proposal does not meet the requirement of Lambeth Local Plan Policy Q2: Amenity as the proposal would compromise the visual amenity from the surrounding area and public spaces making resulting in an unacceptable level of visual amenity.

Impact on privacy and overlooking.

There will be negative impacts on surrounding property's amenity as overlooking will cause privacy issues and mean existing residents can no longer enjoy their outdoor space. This means the development will not accord with Lambeth Local Plan Policy Q2: Amenity, which does not support development, which does not have adequate outlook and does not avoid an undue sense of enclosure, unacceptable levels of overlooking or perceived overlooking.

Access

The site is located at the junction between Kennington Lane and Kennington Park Road. Both roads are part of the Transport for London strategic road network (TLRN). Kennington Lane is also part of the inner ring road and forms the boundary of the congestion charging zone. The site sits within the congestion charging zone. The section on 'Transport, movement and public realm' is not explicit but indicates that vehicle access should be from Kennington Lane. It should be noted that this part of Kennington Lane has significant congestion issues running south from the traffic lights. This is over most of the day and every day. Traffic is almost always queueing back across Renfrew Road and is regularly queuing nearly to Kennington crossroad (with Kennington Road). Servicing off road by vehicle is going to be extremely difficult for much of the day. The SPD states "No vehicular access or servicing should be provided from Dugard Way, although pedestrian access is required". Whilst we welcome the commitment that there should be no vehicular access via Dugard Way, this should also include the construction phase, including the event that the development be phased and Wooden Spoon House is not part of the first phase. It should also be noted that the access road between Wooden Spoon

House forms part of the Water Tower development demise. We are not aware that Lambeth Council has liaised with either the Water Tower Management Company or the freeholder in making this requirement for pedestrian access. It should be noted that the development proposals on the Woodlands Development the other side of the Water Tower development also initially included such access but this request was refused and no such linkage is provided.

Test (d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

The NPPF requires local plan policy to enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

Chapter 11 of the NPPF “11. Making effective use of land” requires that “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions” (paragraph 123).

In paragraph 124, the NPPF states, inter alia, *“Planning policies and decisions should... (e) support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene,...”*.

This proposal is not consistent with the prevailing height and form of neighbouring properties. The alternatives we have set out, that have not been considered as part of the Site 7 assessment, would be consistent.

Chapter 12 of the NPPF deals with “Achieving well-designed and beautiful places”. Paragraph 135 of the NPPF sets out criteria for planning policy in this regard. Inter alia, policy should ensure that developments:

c) 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)

As we have set out above, this proposal is not sympathetic with the prevailing height and form of neighbouring properties. The alternatives we have set out, that have not been considered, would be sympathetic.

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development...

As demonstrated above paragraph 3.9.1 of the London Plan 2021 states that “...*high density does not need to imply high rise...*”. Optimise does not mean get the highest number of units possible on the site in the highest building. It means get the best use of the site, taking into account all factors, including the amenity of existing adjacent homes. This proposal has not considered alternatives which are lower rise and potentially less disruptive to amenity.

f) create places that are safe, inclusive and accessible...

We have demonstrated above the traffic issues mean that there are significant issues with vehicle accessibility due to existing congestion on Kennington Lane.

Stop the Blocks Community Action Group wishes to appear at the examination of this plan.

Yours sincerely

[Stop the Blocks Community Action Group](#)

[REDACTED]

From: David Clarson [REDACTED]
Sent: 03 May 2024 12:15
To: SADPD
Subject: Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV)
Attachments: SoWN response to SAPDP 2024 05 03.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Red category

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please find the response from SoWN to this consultation attached.

Best Wishes

David Clarson
[REDACTED]

Secretary to the Steering Group





London Borough of Lambeth SADPD Consultation

Response from South Bank and Waterloo Neighbours (SoWN)

3 May 2024

St John's Church, Waterloo Road, London SE1 8TY

www.sowneighbours.org

admin@sowneighbours.org

Registered Charity no 1189832



1.0 South Bank and Waterloo Neighbours (SoWN)

SoWN is the Neighbourhood Forum that represents residents, workers, businesses, and cultural and voluntary organisations in the area covered by the South Bank and Waterloo Neighbourhood Plan, with an economy the size of the city of Bath. It dates from 2014 when a group of local people and organisations joined together to develop and write the Neighbourhood Plan that went on to receive 92% support in separate referenda from both residents and businesses.

The Neighbourhood Plan was approved by the London Boroughs of Lambeth and Southwark in February 2020, when SoWN was formally designated as a Neighbourhood Forum under the Town and Country Planning Act 1990, empowered (in the absence of a town or parish council) to lead the neighbourhood planning process.

SoWN continues to represent the local community, providing a forum for local issues, playing a leading role on local initiatives and monitoring how the Plan is implemented.

2.0 Consultation with local Stakeholders

In preparing this response SoWN has met with and consulted with local stakeholders in order to find common ground in the local community to respond, and where possible, to be aligned with the local authority's proposals for the four sites in the South Bank and Waterloo area. Meetings have been held with Coin Street Community Builders (both as a local stakeholder and owners of sites 8 and 9), the Waterloo Elders Group, South Bank BID, WeAreWaterloo BID, South Bank Employers' Group and Waterloo Community Development Group, although there are some WCDG members who consider that only affordable housing should be proposed for this site.

SoWN has also consulted with members of its Steering Group which has representatives from most groups in Waterloo – see Appendix 1.

The results of this Consultation are as follows.

3.0 Proposed Site 1: Royal Street

Whilst it is noted that there is a current, yet to be built out, planning permission for this site which is not in conformity with the proposal in the SADPD for the site, keeping the SADPD proposals in place is welcome in case the site is not developed as the current permission and also to reflect the planning authority's commitment to the heritage of the area where it can.

SoWN is fully supportive of this proposal.

4.0 Proposed Site 2: St Thomas's Hospital

There is wide support locally for St Thomas' Hospital and the work it does. There is therefore full support for the hospital to develop this site so it can meet future healthcare needs. There is also appreciation that the proposal acknowledges the importance of this site and its proximity to the adjacent heritage sites and that any future development must respond to each in a balanced way.

St John's Church, Waterloo Road, London SE1 8TY

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admin@sowneighbours.org

Registered Charity no 1189832



Currently the site has some open space with some landscaping and the buildings are set back from the road. These features should be retained in any redevelopment.

SoWN is fully supportive of this proposal with the proviso that the open nature of the current site layout and its landscaping are retained and the buildings are set back from the roads.

5.0 Proposed Site 8: 110 Stamford Street

There is wide support for more social housing in the area. However, there is concern that the amount of social housing that could be provided on this site as a component of a predominantly market-rate housing development (which the landowner is in any case unwilling to bring forward) is so small as to be insignificant. There would appear to be no other significant community benefit from this proposal. This is also the view held by the landowner. The viability of social housing could of course change over time through increased government grants, so should be specified in the SADPD as an option.

The landowner has also made a case for additional community facilities as an extension of the existing, adjoining Neighbourhood Centre. SoWN members believe the site allocation should include both the options of social housing, should it prove possible, and/or an extension to the Community Centre, or a combination of the two if viable.

We therefore suggest the proposed policy is unsound. It does not provide an effective solution to the needs of the area for social housing, nor does it respond to the ethos of the landowner.

SoWN does not support this proposal.

6.0 Proposed Site 9: Gabriel's Wharf

Whilst there is general support for the uses in this proposal, with the inclusion of an element of extra care housing beginning to acknowledge the need to cater for older residents in the locality, there is a strong desire to see the potential uses of this site expanded so it could include a nursing home if the need is demonstrated.

The principle of a nursing home on this site has been researched both by the landowner and the local Elders Group and has wide support. At the moment the local authority does not recognise there is a need, but it is hoped by collaborative joint working a way forward for the inclusion of a nursing home on this site can be found. The intention would be to meet the needs of the older members of the local population and the north of the borough who eventually need nursing accommodation on a site near their existing homes, family and friends. SoWN supports the strategy of subsidising a future nursing home on this site via enabling development so that places can be offered at local authority rates.

This proposal appears to SoWN to be fully in line with priorities about older persons care expressed in Lambeth's Market Position Statement 2023-28.

Given that the landowner will not wish to deliver substantial housing or office space on this site unless it is part of enabling development to support a nursing home we believe this allocation is unsound

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by virtue of not being deliverable. It is further unsound, in that if a need for a nursing home is demonstrated in the latter part of the plan period, the current uses will not meet community need. Finally, the allocation fails to address the strong desire of both the local community and the landowner to provide a well-funded and affordable nursing home in the local area for the benefit of local residents.

SoWN is fully supportive of this proposal, PROVIDED the possibility of a Nursing Home is added.

7.0 Further point

SoWN would like to know why 72 Upper Ground is now excluded as a site when it was included in the last round and is in the same position as Royal Street. This would appear to be inconsistent.

8.0 Attendance at Examination

SoWN wishes to attend the Examination.

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admin@sowneighbours.org

Registered Charity no 1189832

South Bank & Waterloo Neighbours Steering Group members

Steering Group membership

Archbishops' Park/Resident
 Bright Futures/Resident
 BOST
 Local Business
 Local Business
 Coin Street
 Coin Street
 Councillor
 Councillor
 Jubilee Gardens Trust
 LERA/Resident
 Morley College
 National Theatre
 Park Plaza Hotel
 Oasis
 Old Vic
 Resident – Coin Street
 Resident – County Hall
 Resident – Greenham Close
 Resident – Greenham Close
 Resident - Kennington Road
 Resident – New Cut Housing
 Resident - Octavia Hill Residents Association
 Resident – Peabody
 Resident - Roupell Street
 Resident – Stamford Street
 Resident – Westminster Bridge Road
 Resident – Westminster Bridge Road
 Resident – White House
 South Bank BID and SBEG
 South Bank BID and SBEG
 Southbank Centre
 Southbank Centre
 St John's Waterloo/Resident
 St John's Waterloo/Resident
 Union Jack Club
 Union Jack Club

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Registered Charity no 1189832

Waterloo Action Centre/Resident
WCDG
WeAreWaterloo BID
WeAreWaterloo BID
WeAreWaterloo BID
WeAreWaterloo BID/Resident

St John's Church, Waterloo Road, London SE1 8TY

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admin@sowneighbours.org

Registered Charity no 1189832

From: Ganderton, Holly [REDACTED]
Sent: 03 May 2024 15:40
To: SADPD
Cc: [REDACTED]
Subject: Reps to Site Allocations DPD: Reg 19 Consultation
Attachments: GSTT Reps to Site Allocations DPD Regulation 19.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

Please find attached our representations for the above-mentioned consultation on behalf of Guy's and St Thomas' NHS Trust.

Please confirm receipt of this email and its attachment at your earliest opportunity.

Kind regards,



Holly Ganderton

Senior Planner
BA (Hons) MSc MRTPI

[REDACTED]

T [REDACTED]

WSP in the UK
70 Chancery Lane
London
WC2A 1AF2

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Planning Policy Team
London Borough of Lambeth
Lambeth Civic Centre
6 Brixton Hill
London
SW12 1EG

Our Ref: 2024UK261958

3 May 2024

CONFIDENTIAL

Dear Sir/Madam,

Lambeth Site Allocations Development Plan Document Regulation 19 – GSTT Response

On behalf of our client, Guy's and St Thomas' NHS Trust (GSTT or 'the Trust'), we write in response to the Regulation 19 consultation on the Draft Site Allocations Development Plan Document (DPD) produced by the London Borough of Lambeth Council (the Council herein). The Trust is an important landowner, healthcare operator, research and learning institution and major employer in the Borough and are commenting on the document in their role as the occupier of three sites within this document: Proposed Site 1: Royal Street SE1, Proposed Site 2: St Thomas' Hospital SE1 and Proposed Site 7: 6–12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11.

We previously provided representations to the Regulation 18 consultation for Site 2: St Thomas' Hospital SE1. Overall, GSTT were supportive of St Thomas' Hospital inclusion in the Site Allocations DPD, but required amendments to the allocation to ensure it was compatible for the Trust's ambitions and was deliverable. Further representations are made for this site in this letter, along with representations for Proposed Site 1 and Proposed Site 7, where GSTT have interests.

Proposed Site 1: Royal Street SE1

The site recently benefits from planning permission for redevelopment under application reference 22/01206/EIAFUL. The decision was issued on 20th December 2023. The draft allocation largely reflects the themes of the policy, however the wording associated with Tall Buildings is not consistent with the planning permission and we ask that this is amended to reflect the additional height provided by that consent.

Proposed Site 2: St Thomas' Hospital SE1

The Trust welcomes the inclusion of St Thomas' Hospital as a site allocation and in particular the recognition of the site's potential to contribute to the MedTech cluster, as established by the vision for Waterloo and South Bank in Policy PN1 of Lambeth Local Plan. The role of the site in its potential to deliver enhanced clinical care, ancillary uses to the Hospital such as workspace, and flexibility for relocation of Florence Nightingale Museum, are all supported by the Trust and align with future aspirations for the site. However, the Trust do wish to see a wider site included and object to the recent additions seeking to restrict height and extent of development.

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As mentioned previously, the site allocation has been based on an indicative scheme. It should be recognised that this scheme has not been submitted by the Trust nor is it a representation of the extent of future opportunities on the St Thomas' campus. It is appreciated that this is purely indicative and based on the Council's understanding of anticipated needs, so is meant as a supporting guide, and not a prescriptive option of what development could look like. However, it has clearly directly fed into key elements of the allocation such as the allocation boundary and approach to tall buildings. These are definitive factors that would be significant considerations for any future planning application on the site once adopted. It was noted in our previous representations and subsequent meeting that a planning application could subsequently set out other material considerations/evidence, however the concern remains that an unduly restrictive allocation could undermine the future potential of the site. The Trust therefore still cannot support these elements of the site allocation and holds concern that the proposed approach may limit the potential future development opportunities being considered. We consider each of these in further detail below.

Site Boundary

Whilst we note and welcome the extension of the allocation boundary to the west of the site, we continue to propose that the boundary for the allocation is extended to encompass the whole of the St Thomas' Hospital site. There is by no means an intention to redevelop the entirety of the site, noting the presence of listed structures on the site particularly, however drawing the allocation boundary in this way allows for the site to be considered as a working whole, as it is in practice. There are aspects of development that would significantly benefit from such as approach, for example the consideration of access, public realm and uses. There are also other development opportunities outside of the boundary presented, such as at Block 9, where planning permission has previously been held for sensitive enhancement. The extension of the boundary would allow for maximum flexibility for individual development parcels within the campus to be brought forward and therefore support the future operation of the Hospital as a whole. The site allocation could include further details on certain areas of the site within this wider boundary if required. The addition of the following wording also now adds unnecessary restriction:

"The footprint of Lambeth Wing and A&E (Location B) may be extended eastward towards Lambeth Palace Road so long as it does not come any closer than 15m to the back edge of the pavement."

This is unduly restrictive at the outset and limits potential expansion whereby design and operational needs would be suitably guided and controlled by other policies in the Plan without the need for this specific restriction in this document.

Tall Buildings

The Trust do object to the restriction now placed on building heights within the Regulation 19 document. The addition of the following wording is not supported and is unduly restrictive and sufficiently guided by other policies within this Plan and the London Plan.

"The site is not within a location identified as appropriate for tall buildings, defined as above 45m in this location. The heights on the vision map are dictated by sensitivity in relation to the settings of the Westminster World Heritage Site and County Hall in views from the west. The 31m maximum height seeks to ensure that the 'sky gap' along the edge of the

Elizabeth Tower is preserved in Strategic View 27B. Applicants should be mindful of these considerations when developing detailed schemes.”

It is clear that any future development options would need to be mindful and considerate of the Westminster World Heritage Site as many developments in this locality have been and there is already sufficient adopted policy and guidance on this. Thus, we consider that no further restriction is required here. To place such a specific restriction within this allocation unduly limits the opportunity for future viable redevelopment. The previous wording was clear about the sensitivities and the opportunities to respond positively, to constrain the site at this stage with very specific height restrictions unnecessarily impacts the future potential of this site and is overly obstructive.

We recognise the heritage context of the St Thomas’ Hospital campus, with listed buildings both within and near the site, not least the Westminster World Heritage Site opposite. The campus’ location in the townscape and in key local and strategic views is clearly a significant consideration for any future development. The Hospital should continue to be a positive addition to the townscape and respond to its rich historical context. There are large areas of the site which sit outside, or in the general background, to these key views and are less sensitively located with regards to listed buildings. The area around Gassiot House, for example, could support tall buildings its context with the Park Plaza hotel and the recently permitted Royal Street scheme. The Draft Site Allocations DPD, in overly restricting the height of buildings, undermines the potential for tall buildings that are of high-quality design and responsive to their context to come forward. The potential for tall buildings is likely to be required to support the level of opportunity and enhancement that can be achieved on the campus. We therefore request that the potential for height on the site is considered again with an eye to its existing and emerging context, to positively plan for the additional development that could be supported at the campus. The Trust is keen to work collaboratively with the Council on this and would welcome further discussion.

The Trust continues to request that the expansion of the site allocation and wishes to see the removal of the overly restrictive limits on heights now placed within policy in this draft allocation.

Proposed Site 7: 6–12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

Proposed Site 7 includes Wooden Spoon House, which is owned and operated by The Trust for a number of uses currently including Child Health. As uses evolve over time the Trust seeks flexibility over how the existing building is used and the period for any future redevelopment of the site. The Trust are supportive that if the services are provided or consolidated elsewhere the community use would not be needed to be provided on site. The Trust has previously discussed the time frames and opportunities ahead with the Council and are keen to continue those conversations. The Trust welcome the approach whereby different elements of the site can be brought forward at different times as part of a future redevelopment within an overall vision. That vision needs to recognise the practicalities of continuing to operate such a facility should Wooden Spoon House not come forward in the same timeframe and include appropriate phasing of development where necessary to allow continued safe and practical access by patients and staff.

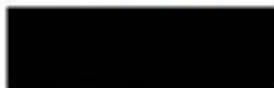
However, it is noted that the number of residential units sought has been reduced and it is considered that this is a step back from the ambition the allocation should promote. The site allocation seeks a mix of uses which are likely to involve viability challenges and as such the



balance of development on this site should be more ambitious on residential delivery and should at least revert back to the previous draft position.

As noted in our representations we would appreciate further discussion on the points raised.

Yours faithfully



Holly Ganderton
Senior Planner

HG/ap

cc:

Encl. Previous representations to Regulation 18 Draft

	First name	<i>InStreatham</i>
	Last name	<i>N/A</i>
Please tick relevant boxes if you require notification of any of the following to your address as stated above.	That the SADPD PSV and associated PCPM have been submitted for independent examination	<i>N/A</i>
	The publication of the inspector's recommendations following the independent examination	<i>The publication of the inspector's recommendations following the independent examination</i>
	The adoption of the SADPD and revised Policies Map	<i>The adoption of the SADPD and revised Policies Map</i>
To which part of the SADPD PSV or associated PCPM does this representation relate (identify specific reference if possible)?	Site Allocation	<i>Site Allocation</i>
	Section	<i>N/A</i>
	Policies Map	<i>N/A</i>
Please provide specific reference(s) here if known	Open-Ended Response	<i>N/A</i>
Do you consider the part of the SADPD PSV or associated PCPM that you identified in Q4 is:	Legally compliant	<i>N/A</i>
	Sound	<i>N/A</i>
	Compliant with the duty to co-operate	<i>N/A</i>
If you considered the part of the SADPD PSV or associated PCPM that you identified in Q4 to be unsound, is it because it is not (please tick all that apply)	Positively prepared	<i>N/A</i>
	Justified	<i>N/A</i>
	Effective	<i>N/A</i>
	Consistent with national policy	<i>N/A</i>

		N/A
Please set out what change(s) you consider necessary	Open-Ended Response	N/A
	Open-Ended Response	N/A
	Response	N/A
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	Open-Ended Response	N/A
Please use this section for any additional comments	Open-Ended Response	N/A

Sustainable Communities, Regeneration
and Economic Recovery Department
Planning and Sustainable Regeneration
Spatial Planning Service
3rd Floor, Zone B
Bernard Weatherill House
8 Mint Walk
Croydon CR0 1EA

Via email only

Contact: Steve Dennington

Julia Dawe

Date: 2nd May 2024

Dear The Lambeth Council Planning Policy Team,

**Site Allocations Development Plan Document Proposed Submission Version
(SADPD PSV)**

Thank you for inviting the London Borough of Croydon (LBC) to comment on the above. We have no comments to make and we confirm that there have been helpful and ongoing discussions to meet the requirements of the duty to cooperate through the preparation of our Local Plans including the joint production of the [Statement of Common Ground between the London Borough of Lambeth and London Borough of Croydon in December 2023](#).

We hope that these comments are helpful and will continue to work alongside Lambeth in the development of our Local Plans.

Yours sincerely,



Steve Dennington
Service Head - Spatial Planning, Growth Zone and Regeneration

[REDACTED]

From: SADPD
Sent: 03 May 2024 17:21
To: Anne Elizabeth Crane; SADPD
Subject: RE: SADPD Site 18

Follow Up Flag: Follow up
Flag Status: Completed

Hello Anne.

Your email and attachment have been safely received.

Best regards.

[REDACTED]
[REDACTED]
[REDACTED]
Climate, Planning and Transport
London Borough of Lambeth

From: Anne Elizabeth Crane [REDACTED]
Sent: Friday, May 3, 2024 4:57 PM
To: SADPD <SADPD@lambeth.gov.uk>
Subject: SADPD Site 18

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Dear Sir/ Madam,

Draft Site Allocation Development Plan Document

Please find attached the representations from the Norwood Action Group in respect of the proposals for Site 18, West Norwood.

Regards Anne Crane



Dear Sir/Madam,

London Borough of Lambeth, Site Allocations DPD. Site 18

Regulation 19 Representations

I am writing as Chair of the Norwood Action Group (NAG) with our representations on this document in respect of the proposals put forward for Site 18, West Norwood Town Centre.

NAG was set up in 1999 with the objective of protecting and enhancing our neighbourhood. It is an independent group with over one thousand members – local residents and businesses and others with an interest in the future of West Norwood. Our particular focus is on planning, heritage, development and transport issues. We work closely with other groups including those others which are members of the Site 18 Local Stakeholder Group i.e. Norwood Forum, Norwood Society, Station to Station and the Norwood Planning Assembly, (responsible for preparing our Neighbourhood Plan). As such elected NAG Committee members have been part of the group of stakeholders assessing the various iterations of plans for West Norwood Town centre including most recently the SADPD Regulation 18 and 19 documents. We have gained the views of our members and the wider public and also participated when invited by the Council in the (very limited in our view) consultation which has been undertaken. Site 18, communicating with local people.

We are concerned with achieving objectives and as such are not anti- development and indeed have worked to lobby, canvass and campaign for projects, policy and schemes which deliver on local consensus for more housing affordable to local people, better local services and facilities and a thriving town centre and employment area. But this cannot be achieved in our view without real involvement from the people that matter - who live, work, run businesses, volunteer and care about the area. Regrettably Lambeth's proposals would in our opinion are unsound because they have failed to be grounded in these local objectives and aspirations.

We have worked with the other members of the Site 18 stakeholder group on their representations and I can confirm that NAG fully supports the comments made. We would urge you therefore to recognise the concerns about the Site 18 SADPD proposals.

Without wishing to repeat what others have said we would like to highlight two key matters which we would hope and indeed expect to be considered in determining whether the SADPD proposals for Site 18 are sound.

The independent viability assessment prepared for the Council by BNP sets out that there is not far short of a £50m viability gap i.e. to come forward each home would need around a £300,000 subsidy. There is no information provided as to how this enormous gap will be funded. Even with presumably what BNP consider to be an optimistic but possible sensitivity test, the gap remains at £30m, or £200,000 for each new home. Our concern is with such a large amount of funding to make up that there will be little or no affordable housing nor indeed the delivery of other requirements of national, London or local policy requirements, including the SADPD itself.

Secondly to deliver the SADPD development in West Norwood, significant site assembly is required. Lambeth are the freeholders of three relatively big sites but the largest is leased to B&Q until almost the end of the Local Plan period. Furthermore the remainder of Site 18 is in multiple freehold and leasehold interests, with few common parties and there are a large number of individual businesses trading in premises on Site 18 and still many residents. Whilst Lambeth say that the SADPD can be implemented incrementally some key aspects can't be such as footway widening which requires whole parades to be set back and the land mark tower and public square which appear to straddle public and privately owned sites. The vehicle servicing plans and planned routes for active travel would also seem to require coordinated development if not comprehensive. The outcome therefore that within the plan period little or nothing will happen in the plan period beyond blight of the Site 18 area as other development, even modest improvements, is prevented or discouraged by the uncertainty and which would spread to the rest of the town centre turning our thriving heart of the community into more and more of a ghost town. Meanwhile local people cannot access affordable housing nor businesses and other groups' suitable space.

We would therefore urge you to think again and put forward more realistic plans which are sound on the basis of the tests but also in meeting local needs, aspirations and opportunities. The local community is ready and willing to participate

Yours faithfully

Anne Crane

Local resident since [REDACTED]

[REDACTED]

From: SADPD
Sent: 03 May 2024 17:20
To: Michael Ball; SADPD
Cc: Jeremy Cross; M Evers
Subject: RE: RESPONSE TO THE REG 19 SITE ALLOCATIONS DPD PSV

Follow Up Flag: Follow up
Flag Status: Completed

Hello Michael.

Thank you for your email. I confirm safe receipt.

Best regards.

[REDACTED]

[REDACTED]

Acting Principal Policy Officer
Climate, Planning and Transport
London Borough of Lambeth

From: Michael Ball [REDACTED]
Sent: Friday, May 3, 2024 4:58 PM
To: SADPD <SADPD@lambeth.gov.uk>
Cc: Michael Ball [REDACTED]
Subject: RESPONSE TO THE REG 19 SITE ALLOCATIONS DPD PSV

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RESPONSE TO THE REG 19 SITE ALLOCATIONS DPD PSV

About WCDG

WCDG is a local community group and charity which has been focused on planning and development of the area for over 50 years. We host regular public meetings about planning issues, and comment on planning applications, and have participated in numerous planning inquiries and EiPs.

Consultation

The SADPD was a major item on the agenda of the WCDG public meetings since 2022, including a meeting on 25th April 2024 attended by over 40 local residents. The following response comes from that meeting, previous meetings and long-standing WCDG policy.

About Waterloo

Waterloo has four of the biggest sites in the DPD, and has a specific set of circumstances:

- Two thirds of all employment in the borough, including major national institutions and international company HQs
- Traditionally large amount of social housing (60% in 1980) still covers much of the area
- Significant pockets of deprivation
- The UK's biggest transport hub
- One of London's biggest hospitals and a large part of a London university
- Europe's biggest arts centre
- The South Bank is one of London's most visited areas
- Some of the last undeveloped CAZ sites still vacant since the war
- Plays specific roles within the CAZ
- An Opportunity Area

About the DPD

Although we don't agree with some of the policies contained within the DPD, we welcome the DPD in principle as a necessary part of the Local Plan, and the rationale provided at 1.12, particularly with regard to encouraging landowners to consider the potential for optimizing the development capacity of their land and helping to deliver place-making objectives. It is essential in Waterloo to optimize sites which can deliver the beneficial growth identified for the Opportunity Area, thereby relieving the stress to maximize (rather than optimize) or overdevelop other sites in Waterloo.

Although we don't always agree with judgements included in the evidence base, and notwithstanding the major criticisms below in the approach taken, we nevertheless welcome the consideration of potential bulk, massing and height at this early stage, to inform an indicative approach by developers to optimizing the sites. We acknowledge that the indicative approach to massing, in combination with land use analysis, is a necessary informative to arrive at the approximate land use quantum in the proposed policies themselves.

However, we do not believe that this indicative approach is sufficient for various fundamental reasons:

1. Circular economy and carbon emissions.

Embodied carbon within the construction process - building materials, waste extraction, delivery, energy - account for somewhere between 28 - 40% of a development's whole life cycle carbon emissions as calculated over the period of 60 years. The NPPF, London Plan and key guidance on the Circular Economy and Whole Life-Cycle Carbon Assessments require developers to take all possible measures to retain existing structures to minimise a development's carbon emissions, such as pre-development audits (these survey existing buildings and demonstrate that retaining them would generate more carbon than demolition and development.) The requirements are outlined in the guidance referred to, published in

March 2022 - too late to make the Reg 18 SADPD, but clearly should be incorporated in this Reg 19 SADPD. The guidance states:

“4.6.2. A pre-redevelopment audit is a tool for understanding whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new development. The audit should be carried out early on (at pre-application stage) and should inform the design.

“4.6.3. If there are existing buildings on a site, a third-party, independently verified or peer-reviewed pre-redevelopment audit is strongly encouraged, including analysis that fully explores options for retaining existing structures, materials and the fabric of existing buildings into the new development; and the potential to refurbish buildings before considering substantial demolition.

“4.6.4. Applicants should complete and submit a pre-redevelopment audit as supporting evidence to their CE statements, where a robust in-depth assessment has not already been completed.”

The SADP makes no reference to this guidance or to retrofit. The Sustainability Appraisal referenced at 1.22 does not address the requirements of this policy, despite reference to Lambeth’s Climate Action Plan (1.20) - which does not address these requirements either. There is no acknowledgement of these issues in the Sustainability Appraisal Stage 2 Baseline Information, Stage A3 (Identifying key sustainability, health and equality, crime and safety issues, and although retrofit is mentioned in section 12 of the Sustainability Appraisal Framework (Stage A4), this has nothing to do with prioritising retention of buildings and minimizing demolition.

Given the importance of these issues, and the national commitment to radically reduce carbon emissions, these are huge omissions. Knowledge of the scale and importance of this has increased with the required reporting on WLCCA. To give the most recent example: a development approved this week in the Southwark part of Waterloo would generate 300,000 tonnes of carbon, 60% of which would be emissions during construction. Development recently approved at 72 Upper Ground would generate 103,000 tonnes of carbon - the equivalent of all 4,000 office workers driving in from Surrey daily to work for 20 years - and a further 90,000 tonnes would be generated by development approved for Site 1 Royal Street.

For this reason the SADPD is unsound.

At the very least there should be:

- a clear objective requiring that retaining existing built structures must be prioritised over demolition and rebuild in conformity with the guidance
- the context section of each site allocation (SA) contains a clear description of all existing development on each site and any knowledge of its condition and potential adaptability, as well as reference to their potential retention. This information should critically inform the Vision and Policy sections of each SA
- a requirement that all development proposals for these sites are informed by and include a pre-development audit (including a condition survey).

2. Viability

The DPD does not include evidence of viability, and thereby of deliverability. This issue affects all of the sites in the SADPD in Waterloo. ***For this reason the SADPD is unsound.***

The NPPF is clear that planning policies should take into account viability, and that that viability evidence should be made publicly available at the plan-making stage:

“Planning policies and decisions should support development that makes efficient use of land, taking into account:...b) local market conditions and viability” (124)

“All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.” (58)

The SADPD Sustainability Report states that

“Consideration of viability has informed indicative development quantum and the expectations around delivery of affordable housing and affordable workspace (where relevant)”

Unfortunately no viability evidence is provided. As a result, the indicative approach is flawed. This is a key issue with all sites, and is specifically an issue on the Waterloo sites, creating much dispute.

3. Rationale for allocation of sites

The rationale for the sites included and excluded from this SADP as set out at 1.12 - 1.14 is unsound.

There are a number of strategically important sites which fulfil the requirements set out at 1.12-14 which have not been included, such as Waterloo Station Masterplan, which, as a result, will not be properly tested through Examination or properly embedded in planning policy. Site 1 Royal St is included, despite permission being granted some months ago for a massive redevelopment (22/01206), while site allocations for the ITV site (which includes Gabriel’s Wharf) are being deleted, and site allocations at Elizabeth House (York Rd) and Mercury House/Union Jack Club (Waterloo Rd) have been deleted prior to permissions being granted, or where there is a strong likelihood permissions won’t be implemented due to over-provision of new major office stock.

Permissions for office stock in the past 3 years across Waterloo amount to the equivalent of 6 Shards. Unsurprisingly, given the glut of very expensive high-quality design Grade A office permissions, none of them are coming forward: the first and most prime location - Elizabeth House - has had three permissions (1996, 2013, 2021) for around 1m sq ft of office which have not been implemented. As a result the site has become an eyesore at the heart of the most well-connected transport hubs in the UK. On top of that we have 1.7m sq ft of office permitted for Royal St, nearly 1m sq ft of office space at 72 Upper Ground, nearly 2m sq ft of office permitted at 20 Blackfriars Rd and The Cut (in LBS) and 350,000 sq ft approved for Waterloo Rd. The context is that in the past twenty years the development of major office has only been implemented on the Shell site.

In desperation to make good the aspiration in the Waterloo OAPF of significant amounts of central London office space being developed, it would appear as if the local planning authority is being over-permissive with developers proposing sites for major offices, thereby, through the creation of a glut, undermining the viability of each of these schemes. This is unsound. A more strategic approach to identifying sites suitable for office development is required, including policies which seek a mix of uses on these sites including a significant quantum of affordable housing. Again, the swift and effective implementation of the Shell site approval for 750,000 sq ft of office and 947 flats since 2014 is instructive.

4. 4. Specific Site Allocations

Site 1 Royal St

We strongly support the principle of a SA for these sites, given its history of neglect, the various unimplemented plans for it since the War, and the huge potential for residential and other uses these sites offer as a comprehensive development or as piecemeal development.

The sites were once a heavily residential area with a modest mix of other uses. The County of London Plan and the postwar Comprehensive Development Area envisaged an extension to Archbishops Park, given that North Lambeth was designated an area of open space deficiency. With the loss of the Stangate Triangle – an area of open space now occupied by the hospital – this designation was carried into the Waterloo District Plan (1977) and the UDP (1998). However, the landowner – now known as G&ST Foundation – refused to come forward with the extension. Instead they were granted permission in 2007 following an Appeal inquiry for 640 homes, 50% of which would be affordable, the buildings of which were designed to be lower as they approached the Park, and included significant private green open space adjacent to the Park. Although we deeply regretted the loss of the un-listed 1847 school buildings and 10 Royal St, WCDG supported the Appeal on the basis of its optimised affordable residential component and its appropriate relationship to the Park.

We therefore partly support the Policy regarding its approach to the land south of Royal St:

- That the C19th buildings are retained, and
- That that part of the site is not appropriate for tall buildings, and that no buildings are developed adjacent to the Park (as in the indicative model) or are kept low, in keeping with the retained 1847 school and the magnificent row of plane trees along the Park's northern boundary.

It is to be noted that the 40m high buildings on the edge of this area adjacent to Carlisle Lane are located on what is currently a piece of open space, which was recently conditionally sold by LBL to the G&STTF and must be replaced somewhere on the site, as per policy on loss of open space in the NPPF, LP and LLP. There is a similar piece of open space on the Lambeth Palace Rd side which requires replacement if developed. These pieces of open space should be included in the Context section of existing land uses.

Circular economy: The site has two major 1960s concrete residential buildings and one large/tall concrete/steel/glass office building. They are all basically sound and architecturally revered, as witnessed by the C20th support for their retention. Their retention, retrofit or extension should be the starting point for consideration of this site. There are large areas including car parks of the site without buildings which could be more intensively developed to optimise the site. We support the recommended retention of the one-storey Victorian school buildings and 10 Royal St for heritage reasons, but request Lambeth apply similar rigour to minimising the carbon impact of developing this site.

As already noted, nowhere in the SADPD or in the Sustainability Appraisal is there any consideration of the need to firstly consider retaining, retrofitting, or extending the existing buildings. There is no analysis of the existing accommodation and no requirement that a pre-redevelopment audit is undertaken to assess options. ***For this reason the policy for Site 1 is unsound.***

Land Use

Although once heavily residential, the existing protected tenants were trammelled up into the two current residential blocks of Canterbury House and Stangate House, with all of the tenants enjoying protected rents akin to social housing. Although these tenancies have all expired over the past decade, given the history, the ownership by a health charity, and the evidence of the 2007 permission, we believe that a more significant part of the site should be given over to residential than envisaged, and that the majority of any residential should be affordable housing, to replace the 133 homes which were effectively affordable for the best part of a century.

Waterloo's renaissance began in the 1970s with a battle over the amount of land given over to offices replacing what had been residential. What was successfully fought for were a mix and balance of land uses in the neighbourhood, which has stood Waterloo well and has become the blueprint for inner city regeneration everywhere. As set out above, the recent office permissions are resulting in a potential imbalance of land uses emerging once again. We do not need more *unaffordable* housing – which simply attracts more investors without households or residents – but more *affordable* housing, including to house the key workers which keep the hospital and central London functioning. At the very least the replacement 129 units should be affordable; if, as a result of viability issues, this requires closer to 250 housing units in total being provided, that would be acceptable in order to achieve the 129 affordable homes.

There is already a need for social infrastructure, including a GP health centre and a library, and more, depending on how much housing is developed. The re-use of the 1847 school buildings and 10 Royal St could be a good site for a community health provision; alternatively, funding for the upgrade of other existing social infrastructure would be welcome.

In proposing an over-provision of office space, under-provision of affordable housing, and no social infrastructure required, the Site Allocation is unsound.

The area south of Waterloo Station to Archbishops Park suffers from appalling illegibility and fails to join up with any other part of Waterloo apart from the Park itself. This site could provide a clear legible pedestrian route from the UK's biggest transport hub at Waterloo Station to St Thomas' hospital – via Lower Marsh and Upper Marsh.

Urban greening and trees: An application has been permitted which would require significant pruning of the trees in Archbishops park close to the site boundary, by up to 40% of their cover, plus massive root protection. We have little confidence this will sufficiently protect them. The Site Allocation talks of “should”; this must be replaced with “must” throughout the paragraph.

Site 2: St Thomas' Hospital

We have not been informed by GST hospital why they might wish to redevelop part of their site, and are not aware as to why it warrants a SA. Clearly it is a significant site because of its location, with two of London's great listed civic buildings either side and the Westminster WHS across the river, but it is a reasonably simple site with one landowner. A key issue of any redevelopment is the cumulative impact of development of site 2 along with the Royal Street sites, in terms of land use, townscaping and placemaking, and heritage impact. It would be inappropriate to determine these issues across both SAs separately: so why are they not being considered together as one SA?

While the site is not within a location identified for tall buildings, uniquely in Lambeth this refers to buildings up to 45m high, which would be a tall building anywhere else in London, particularly given its proximity to the river. Gassiot House is 32m and is already damaging to the Westminster WHS. It's replacement with Block A in the model evidences the fact that a building substantially higher and closer to 45m would be a significant intrusion in views out of the WHS. It could create an appearance of a wall of development as one crosses the river. The massing should be broken up and much lower, akin to the current Gassiot House of 32m. It would also appear to conflict with the listed County Hall. The taller Park Plaza has been carefully designed so that it looks subservient and slightly lower than the parapet at County Hall; this effect would be completely undermined by the proposed massing of Block A.

The proposed height and massing of Block B is equally detrimental to Archbishops Park and Lambeth Palace Conservation Area by again presenting a wall of development at least 3 times the height of existing buildings. Together with that proposed in terms of height and massing for Site 1, there is no sensitivity as to the impact on Lambeth Palace Rd, which will become a deeply unpleasant canyon, trapping pollution and reducing air quality as well as rendering the road insufferable to pedestrians.

The evidence is clear that the quantum of development proposed would not result in good townscape, and so the Site Allocation is unsound.

Site 8: 110 Stamford St

Genuinely affordable housing is the number one priority for Waterloo, primarily because virtually none has been developed in the past 20 years, even as social housing has been lost to RTB, and numerous hotels and millions of sq ft of office have been approved, along with around 1,000 residential homes. The argument made by every developer is that the land value is simply too high to warrant affordable housing – better to invest some £106 further south. Naturally we don't accept such a simplistic approach, which flies in the face of the general proposition of creating mixed and balanced communities.

Coin St Community Builders (not a charity but a 'not-for-profit' company limited by guarantee) have owned for forty years a number of sites for social co-op housing and social infrastructure, which they have yet to develop. These are the only sites available for a high proportion of affordable housing given their zero land values (there are covenants preventing CSCB using the sites for commercial purposes).

The NPPF states that "planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability." (68)

Given the potential outlined above and the very high returns which can be generated from ground floor and basement retail in area of London with some of the highest footfall close by (30m visitors walk along the South Bank each year, less than 200m away, while nearly 100m spill out Waterloo Station, only 300m away), it is essential that planning policy acknowledges their unique privilege in Waterloo as sites capable of providing a very significant proportion of affordable housing.

The vacant site is not only a long missed opportunity, it is an eyesore, as the various pictures in the evidence base demonstrate.

There has been much debate locally about this site. The evidence from numerous meetings is that getting more social housing is far and away the highest priority for the Waterloo community. There are longstanding aspirations for the various undeveloped Coin Street sites to be primarily for co-op social housing, which is the basis on which CSCB were transferred the sites at a discount / nil rate; this is

particularly urgent given that they have been vacant for at least 40 years. There has been a shift in thinking from WCDG's 2022 response with regard to Gabriel's Wharf (Site 9), where there is recognition that nursing home beds are acceptable as an alternative to social housing, provided that a very significant part of the nursing home is indeed affordable/cross-subsidised. But if this is to be the case, and Gabriel's Wharf given over for that purpose, it becomes even more imperative that Waterloo and Lambeth get at least some of the 180 unbuilt social homes originally promised by Coin St onto the Cornwall Rd site (notwithstanding the fact that there are a number of very large family homes in Iroko compared to the original Coin St proposals).

The feasibility WCDG did 5 years ago in an attempt to stop CSCB agreeing to lease the site to Abba/ Mama Mia indicated that the site could accommodate up to 50 homes, depending on the profile and size - and this principle and use was enthusiastically welcomed by a wide range of residents and other stakeholders at the time. Considerable doubt has been expressed at the landowner's claim that social housing on this site is not viable, given that there are no land costs, as well as the clear opportunity for an element of cross subsidy from potential commercial uses at the ground floor.

Regarding using this site for social infrastructure or community uses, clearly the ground floor could also be community uses, but the loading of yet more social infrastructure to this northern part of Waterloo - on top of a 4-storey neighbourhood centre and the promise of a leisure centre and swimming pool - is inappropriate for the balance of needs in the neighbourhood (e.g. the large proportion of lower income housing broadly to the south of Baylis Road). Some additional community uses could also quite probably be accommodated in the existing Neighbourhood Centre, much of which is largely used for commercial lettings.

The site is not appropriate for a tall building. The building should relate meaningfully and sympathetically to the very important private open amenity space of Iroko (potentially even sharing it as amenity?) – it should not overshadow or overlook this space, except where it relates to it. Development should also relate to the fine terrace across Stamford St.

Site 9: Gabriel's Wharf and Princes Wharf

Site 9 was acquired for a heavily discounted price to provide social housing, community uses, and local employment. CSCB have not been able to develop Princes Wharf because of the long lease by ITV which is coming to an end. In the meantime CSCB have used Gabriel's Wharf imaginatively for independent commercial uses which contributed to the subtle mix of uses which help create the enormous international success of the South Bank. Development of these sites needs to build on that imaginative use, whilst optimising the quantum of affordable housing on the site above the ground floor. There has long been proposals for the site to be used for a nursing home with a large affordable element, which is strongly supported locally, and is effectively akin to housing. The site and its views and liveliness would be extremely uplifting to many people whose movement is restricted.

CSCB have been developing proposals for this use for many years, and are clear that this could be viable as well as beneficial to the community. ***The Site Allocation does not include this use and is thereby unsound. This use needs to be an option.***

The relationship to Bernie Spain Gardens and the river are critical and potentially enormously beneficial commercially.

We totally disagree with the quantum of development proposed, as illustrated in the indicative approach (of a maximum height of 44m), and illustrated in Figure 14. Together with the proposals for the ITV site this would create a wall of development which would be oppressive as well as harmful in terms of the daylight and sunlight impacts to the residents of the social housing along Upper Ground – see TVIA view 6, which we consider unacceptable. The view from Waterloo Bridge (TVIA view 4) would be impacted negatively with such a mass of building; again, the cumulative impact with the current proposals for the ITV site would be terrible. We are not saying nothing can be high: but the Oxo tower across Bernie Spain Gardens should be used as the baseline in terms of scale and height.

The scale of development proposed in the SADPD would cause significant negative impacts and is therefore unsound.

We would like to participate in the Examination in Public


All the best

Michael Ball
Waterloo Community Development Group



www.wcdg.org.uk

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The text you are trying to insert is not allowed. It may contain characters that are not supported by the system.

[REDACTED]

From: Loughborough Junction Action Group [REDACTED]
Sent: 03 May 2024 16:45
To: SADPD
Cc: [REDACTED]
Subject: Response from Loughborough Junction Neighbourhood Forum to SADPD Regulation 19 consultation attached.
Attachments: LJNeighbourhoodPF01.05.2024agendaSAPDP.docx.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Green category

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LJ Neighbourhood Forum response to Regulation 19 consultation on the Site Allocations Development Plan Document

Loughborough Junction Action Group (LJAG)

LJAG is a local charity with the mission to make Loughborough Junction a great place to live and work. We are one of Lambeth council's neighbourhood Forums and we co-ordinate the LJ Neighbourhood Forum which concerns itself principally with planning, public realm and transport policy.

The LJ Neighbourhood Forum would like to preface its comments on the individual sites that form part of Lambeth's Site Allocations Development Plan Document with observations about the process.

The Forum feels that the method of compiling the SADPD would have been more robust if the community had been engaged in the choice of sites and had been involved in deciding what kind of developments were appropriate. What we were presented with at the Regulation 18 consultation reflected Lambeth planners' views of what would be an acceptable development for each of the sites. Additionally, very few suggestions from individuals and community groups put forward at the Regulation 18 consultation made their way into the Regulation 19 consultation. In other words, the consultation process has felt like a lazy tick-boxing exercise.

We are also critical of the time that it has taken to get the SADPD approved. Following the failure of the Loughborough Junction masterplan, it is our recollection that the preparation of an SADPD was first mooted in 2017, but it wasn't until January 2022 that the Regulation 18 consultation began; and it took a further 2 years before the Regulation 19 consultation appeared. This is particularly problematic for one of the sites in Loughborough Junction where we are constrained in our objections to a controversial co-living development. It is our understanding that the SADPD gains weight as it goes through the adoption process, but it doesn't become planning policy until it is adopted. If the SADPD had been adopted earlier, we would have had a stronger case for opposing this development, and it is unlikely that it would have ever been proposed.

Site 22 1 7 3-11 Wellfit Street, 7-9 Hinton Road, Units 1 – 4 Hardess Street, SE24.

This is the one remaining major development site in Loughborough Junction and presents the opportunity to create something architecturally significant for the area but the vision for the site does not recognise this. The LJ Neighbourhood Forum welcomes the proposed route through from Herne Hill Road to Hinton Road following the line of the railway viaduct, opening access to local railway arch facilities such as the boxing gym, art studios and cinema. We also welcome the replacement of existing industrial uses on the site and the provision of a mixed used development.

While we recognise that Higgs Yard has been built as approved to 16 storeys, we believe the SADPD proposes an overdevelopment of the site. A building height of up to 40 metres – 12 storeys - will overwhelm and produce a glowering presence in the local streetscape of three storey houses in Hinton Road, opposite the petrol station, and in Wanless and Wingmore roads and further afield in the Milkwood estate of 2 storey houses.

We are also concerned about the impact on the Loughborough Park conservation area - a local heritage asset as well as western views from Ruskin Park.

The community is currently considering a planning application for a mixed-use scheme which replaces the existing industrial space, provides a route through between Herne Hill Road and Hinton Road, but controversially proposes building 320 co-living spaces in buildings of up to 14 storeys. We understand that developers need to heed the draft SADPD and that it gains strength as it goes through the process of being adopted, but it only becomes policy once it is adopted. Once again, we make the point that we wouldn't be fighting this proposal if Lambeth had moved more quickly to implement its SADPD

Site 23 Land at corner of Coldharbour Lane and Herne Hill Road, SE24.

This is one of the most important sites in LJ being at one of two junctions – the other being at the junction of Coldharbour Lane/Hinton Road/Loughborough Road – which require special treatment. The significance of the site is not fully recognised in the vision for the site. There should be greater emphasis placed on good design and the animation of the street frontage, with an economic investigation into which uses could achieve this aim. We do not oppose the resiting of a church on the site, as this was historically the site of a significant Victorian chapel, now demolished. However, unless it contributes to the appearance and animation of the town centre and this stretch of Coldharbour Lane, we would oppose it occupying the whole of the ground floor.

The LJ Neighbourhood Forum welcomes the proposal to widen the pavements at this important junction and the setting back of the building line on Herne Hill Road to match that of Higgs Yard. We also welcome the proposed new route along the railway viaduct opposite the station. This would increase the permeability of the area and connect it to Higgs Yard.

We reject the contention from Lambeth planners' comments on the Regulation 18 consultation that: "It is considered that complementary development of a similar height (to Higgs Yard) on this site will establish a small cluster of tall development around the railway viaducts and bridges, whilst clearly different from the low-rise residential hinterland further to the south, the presence of taller development here is not considered unacceptable in principle in light of the assessments undertaken."

The Forum objects to the idea that Loughborough Junction should accept "a small cluster of tall development around the railways viaduct and bridges" and we object to the proposed height of 30 metres - the equivalent of 9 storeys – when the surrounding town centre frontages are no more than 3 or 4 storeys. The site sits separately from the surrounding Higgs Yard buildings and the height of these buildings is no justification, especially as the taller buildings on this development are deliberately sited next to the elevated railway line. The reference for any new buildings should be its close neighbours. We have no objection to the concept that this should be a mixed used building as Loughborough Junction has historically been an area where residential sits comfortably next to industrial and other uses.

The vision for the site needs to address air quality, and how the development could contribute to its improvement. Nor is there any mention of the provision of additional greenery - in an area Lambeth recognises as deficient in public green space - to improve the biodiversity of the site. An area at the back of the site could be laid out as a public garden linked to the new pedestrian access along the railway line as well as with the provision of a roof garden.

[REDACTED]

From: Info Norwood Forum [REDACTED]
Sent: 03 May 2024 18:59
To: SADPD
Subject: Re: Submission by West Norwood and Tulse Hill Community Stakeholder Group in response to SADPD Regulations 19 consultation

Follow Up Flag: Follow up
Flag Status: Completed

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Many thanks [REDACTED]
Kim

On Fri, 3 May 2024, 17:13 SADPD, <SADPD@lambeth.gov.uk> wrote:

Hello Kim.

Your email and request have been safely received.

Best regards.

[REDACTED]

[REDACTED]

Acting Principal Policy Officer

Climate, Planning and Transport

London Borough of Lambeth

From: Info Norwood Forum [REDACTED]
Sent: Friday, May 3, 2024 4:15 PM
To: SADPD <SADPD@lambeth.gov.uk>
Subject: Submission by West Norwood and Tulse Hill Community Stakeholder Group in response to SADPD Regulations 19 consultation

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West Norwood and Tulse Hill Community Stakeholder Group

This group comprises: Norwood Forum, Norwood Society, Norwood Action Group, Station to Station BID, members of the former Norwood Planning Assembly, Knollys Yard Community Action Group, and local residents.

Many of the above listed have made individual representations regarding Site 18 focussing on their areas of expertise and knowledge, and we each fully support these representations.

Collectively we wish to make it clear, we are requesting the opportunity to make personal representation to the Inspector regarding Site 18 in the current Lambeth SADPD proposals.

Confirmation of receipt of this request as part of the SADPD Regulation 19 consultation would be appreciated.

Regards

Kim Hart
on behalf of the West Norwood and Tulse Hill Community Stakeholder Group

Kim Hart

Chair, Norwood Forum

www.norwoodforum.org

We are local volunteers dedicated to supporting a sustainable, vibrant, and creative community by making a positive difference to the quality of life for the people who live, study, and work in Norwood.

Keep in touch with the latest news here www.norwoodforum.org/sign-up

Working towards a Greener Norwood

Please share your ideas and concerns with us as we focus on this new project in the coming months:
info@norwoodforum.org

From: Paula Carney [REDACTED]
Sent: 03 May 2024 16:13
To: SADPD
Subject: Lambeth Site Allocations Development Plan Document Reg 19: Representations on behalf of Coin Street Community Builders
Attachments: Lambeth SADPD CSCB 030524 final.pdf
Follow Up Flag: Follow up
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Dear Sir/Madam

On behalf of our client, Coin Street Community Builders (CSCB), please find attached representations to the Reg 19 Lambeth Site Allocations Development Plan Document.

Please note that we would also like to review the BNPP viability evidence base and submit follow up comments.

I can also confirm that CSCB will wish to submit further statements and attend relevant hearing sessions at the EIP, at the relevant time.

I look forward to receiving confirmation of your receipt of the attached representations.

Kind Regards

Paula

Paula Carney
Director

Tel (mob): [REDACTED]
Email: [REDACTED]
Address: Scott House, Suite 1, Office 3.01, The Concourse, Waterloo Station, London SE1 7LY

CARNEYSWEENEY

Birmingham Cardiff Exeter London



[REDACTED]

From: Paula Carney [REDACTED]
Sent: 13 August 2024 12:12
To: SADPD
Cc: [REDACTED]
Subject: Re-consultation on Lambeth's Site Allocations DPD Proposed Submission Version:
Response on behalf of Coin Street Community Builders
Attachments: SADPD CSCB response 13 August 2024 final.pdf

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Dear Sir/Madam

Please find attached representations to the re-consultation on Lambeth's Site Allocations DPD Proposed Submission Version, on behalf of Coin Street Community Builders.

If you have any queries, please don't hesitate to contact me.

Kind Regards

Paula

Paula Carney
Director

Tel (mob): [REDACTED]
Email: [REDACTED]
Address: Scott House, Suite 1, Office 3.01, The Concourse, Waterloo Station, London SE1 7LY

CARNEYSWEENEY

Birmingham Cardiff Exeter London

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Office 3.01, Scott House
Suite 1, The Concourse
Waterloo Station
SE1 7LY

13th August 2024

London Borough of Lambeth,
Planning Policy and Place Shaping,
P.O. Box 80771, London,
SW2 9QQ

By email to: sadpd@lambeth.gov.uk

Dear Sir/Madam,

**Reconsultation on Lambeth's Site Allocations DPD Proposed Submission Version
Response on behalf of Coin Street Community Builders**

On 3rd May 2024, we submitted representations on behalf of Coin Street Community Builders (CSCB) in response to the Consultation on Proposed Site Allocations Development Plan Document. These representations are attached to this letter in full for ease of reference, and a summary of CSCB's position is below.

Proposed Site 8: 110 Stamford Street SE1

In May, we commented that in the light of the significant need for further community space in the area, CSCB's intention is to develop the site wholly for community purposes with other uses, for example Class E uses, being included in any scheme for cross subsidy or community purposes. This is in line with its own assessment of local community needs, which are now also subject to a neighbourhood assessment led by the neighbourhood forum, South Bank and Waterloo Neighbours.

Because the Council's aspirations for this site are incompatible with CSCB's objectives, CSCB commissioned its own options and capacity study for the site, which has been shared with the Council. The conclusions of this study are that the Council's expectations of the capacity of the site are unacceptable in terms of height and unrealistic in terms of housing delivery.

The proposed allocation is also incompatible with the covenants imposed on the land forming CSCB's estate at the time of its transfer to CSCB from the GLC in 1984.

On the basis of the above, the draft allocation is unsound by reason of being undeliverable and is likely to condemn the site to continued interim uses in the medium to long term.

We note that the new Government's proposed amendments to the NPPF (July 2024) include the following addition: 'Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.' (paragraph 98). This should also be borne in mind in relation to the Site Allocations DPD.



Proposed Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1

In its previous representations in May 2024, CSCB noted the Lambeth Local Plan Examination Inspector's comments in para 110 of his report that *'The issue of the potential need for additional nursing homes in Lambeth was the subject of considerable discussion during the hearing sessions'* and in para 111 that *'this issue can appropriately be addressed at the forthcoming Draft Site Allocations Plan'*.

It is CSCB's case that there is a need for nursing home beds in the local area, a position which we believe is only reinforced by Lambeth's Integrated Commissioning's recent *Lambeth Market Position Statement 2023–2028*.

Our representations submitted in May set out the long-term aim of CSCB to develop a nursing home on Gabriel's Wharf cross subsidised by development on Prince's Wharf.

In advance of this, CSCB will be prioritising the delivery of its Doon Street and Bernie Spain Gardens north developments. Gabriels Wharf is to be the subject of investment so that the existing uses can remain for at least the next 10 years, with existing buildings and land immediately surrounding re-purposed to this end. Princes' Wharf is leased to ITV until 2029 and will then be re-purposed for appropriate meanwhile uses. Accordingly, Site 9 is not envisaged to be available for redevelopment for at least 10 years.

We would reiterate that it is important for the Site Allocations DPD to refer to this position and to accept meanwhile uses as referred to above.

The ambition to develop cross-subsidised affordable nursing home accommodation on Site 9 is therefore for the 2030s, and towards the end of the plan period. In this context, in our representations in May, and in subsequent correspondence with Lambeth's Planning Director we requested that a **different approach** be taken to the question of future need for nursing beds which currently continues to be the subject of disagreement with Lambeth Integrated Commissioning.

The Council's draft policy wording for Site 9 states: *'This may include an element of extra care housing where need is demonstrated'*. In our representations, we therefore suggested that this be amended to *'This may include an element of extra care housing or a nursing home where need is demonstrated'* (our emphasis in both cases).

In the light of the revised timescale for the long term redevelopment of Site 9, we would re-emphasise our request that the Council gives serious consideration to revising the wording of the Site 9 policy as outlined above. This would enable the question of need to be properly addressed in the context of the demand (or otherwise) for nursing beds at the appropriate time which could be up to 10 years hence. The immediate practical benefit would be to put the current disagreements to one side and avert the need for both CSCB and the Council to spend yet more time and money on research and negotiation before and at the EIP, when it would be much better to address the issue of need in the context of the circumstances at the appropriate time.

Yours faithfully



Paula Carney
Director
CarneySweeney

Encl.



London Borough of Lambeth

Consultation on Proposed Site Allocations Development Plan Document

Representations on behalf of Coin Street Community Builders

3rd May 2024

1.0 Introduction

1.1 Coin Street Community Builders (CSCB) is a social enterprise which owns 5.5 hectares of land in the Waterloo, South Bank and north Southwark area. The company is limited by guarantee whereby all the income generated is used to deliver public service objectives as opposed to being distributed to shareholders. As a result, CSCB's motivations and decision making is based on the real needs of the Waterloo and north Southwark neighbourhood it serves, not on considerations of traditional commercial developers. All members of CSCB live in this neighbourhood.

1.2 CSCB's freehold includes the following two sites which are identified in the Site Allocations Development Plan Document (SADPD):

- Proposed Site 8: 110 Stamford Street SE1
- Proposed Site 9: Gabriel's Wharf & Princes Wharf, Upper Ground SE1

2.0 The NPPF

Plan Making

2.1 Paragraphs 15 and 16 of the NPPF, December 2023 state (with our emphasis in **bold**):

*15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; **and a platform for local people to shape their surroundings.***

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational **but deliverable**;*
- c) **be shaped by** early, proportionate and **effective engagement** between planmakers and **communities, local organisations, businesses, infrastructure providers and operators** and statutory consultees;*

- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.2 Paragraph 35 sets out the tests of soundness as follows and states that plans should be:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

2.3 The allocations for Sites 8 and 9, as set out in the draft Lambeth Site Allocations DPD are not in accordance with the NPPF as they:

- do not provide a platform for local people to shape their surroundings;
- are not deliverable; and
- have not been shaped by effective engagement with communities, local organisations, businesses and community infrastructure providers.

2.4 The draft allocations are wholly inconsistent with CSCB's approach to its assets and to real community needs. The Council has not recognised the special character of the landowner (and thus the deliverability of the Council's draft allocations), despite the fact that the Council is a partner with CSCB in many other matters and fully appreciates the nature of CSCB's character and objectives as an organisation in those activities.

The Council's evidence base for the allocations includes indicative capacity studies and viability appraisals developed on the basis that CSCB is a conventional developer. This is not realistic in two key ways:

- a) CSCB will not develop the sites in a way that does not reflect their assessment of local community needs, based on 40 years' experience of serving the neighbourhood.
 - b) It has been suggested by the Council that CSCB could develop these sites commercially with a developer along the lines of the site allocations and use the proceeds to support its community activities. This in turn fails to take account of three further key factors:
 - i) The 1984 transfer of the land from the GLC including these two sites includes covenants which preclude such an approach.
 - ii) It would be highly detrimental to CSCB's financial model to dispose of or capitalise the value of these sites – its community facilities and programmes, and the fulfilment of CSCB's obligations to manage and maintain large areas of heavily used South Bank public realm militate against such an approach to the land which forms the overwhelming majority of its asset base.
 - iii) It would rob the neighbourhood of scarce land that could otherwise serve priority community needs in an area subject to extensive commercial development and densification.
- 2.6 The Site Allocations DPD states that ...*'The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy.'* (para 1.2). In the case of Sites 8 & 9, the proposals in the SADPD do not do this. Instead, they are likely to deter development by CSCB.
- 2.7 The SADPD goes on to state *'There is also no need in Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the revised Lambeth Local Plan. However, the new site allocation policies will help to accelerate delivery of housing in the borough, maintain the necessary pipeline of new housing and thereby ensure housing delivery targets continue to be achieved. They will also enable the timely renewal and optimisation of social infrastructure and commercial floorspace.'* (para 1.14). Again, in the case of Sites 8 & 9, the proposals in the SADPD will not do this: by ignoring CSCB's assessment of the *needs* of the neighbourhood it serves, the current draft SADPD discourages investment in these sites.

Meeting the needs of different groups in the community

- 2.8 Revisions made to the NPPF in December 2023 recognise the importance of Local Planning Authorities identifying housing need for different groups in the community, including for those who need care.

- 2.9 Paragraph 60 of the NPPF states,

*“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, **that the needs of groups with specific housing requirements are addressed** and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, **including with an appropriate mix of housing types for the local community.**” (Our emphasis)*

- 2.10 The revised NPPF encourages local planning authorities to act pro-actively and ensure that their policies are deliverable to address the identified needs of the community. This is reflected in paragraph 63 which states,

*“Within this context of establishing need, the size, **type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.** These groups should include (but are not limited to) those who require affordable housing; families with children; **older people (including those who require retirement housing, housing-with-care and care homes)**; students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes”. (Our emphasis)*

- 2.11 Planning Practice Guidance for Housing for Older and Disabled People pre-dates these changes to the NPPF. However, it acknowledges the increasing numbers of the elderly and states ‘People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is [projected to double to 3.2 million](#).’ The Guidance goes on to state ‘It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations.’

Paragraph 125 of the NPPF also provides further support by encouraging Local Planning Authorities to “...**take a proactive role in identifying and helping to bring forward land** that may be suitable for meeting development needs.....”(Our emphasis)

- 2.13 The Inspector's report on the Examination of the revised Lambeth Local Plan, with regard to need for a nursing home, stated at paragraph,

"I therefore consider that the issue can appropriately be addressed at the forthcoming Draft Site Allocations Plan for Lambeth, which I understand is to be consulted on shortly, and that it is the intention of the council to include Coin Street in that document."

- 2.14 The Site Allocations DPD does not meet the NPPF, in particular paragraph 126, which states,

*"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of plan updates, **reallocate the land for a more deliverable use that can help to address identified needs** (or, if appropriate, deallocate a site which is undeveloped); and b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area". (Our emphasis).*

3.0 Proposed Site 8: 110 Stamford Street SE1

- 3.1 The site is cleared down to basement floor level and enclosed by a hoarding. It has been subject to a series of interim uses since the demolition of a Boots office building in 1985.
- 3.2 Adjoining to the east is no. 108 Stamford Street - the Coin Street Neighbourhood Centre, which houses CSCB's staff, a children's centre, youth & community programmes, midwifery facilities, meeting and training facilities, and a restaurant. The site bounded by Stamford Street, Coin Street, Upper Ground and Cornwall Road was subject of a design competition won by Haworth Tomkins Architects and has been developed in phases, Iroko Housing Co-operative with its communal gardens was completed in 2001. The first phase of the Neighbourhood Centre was completed in 2007. That phase has been designed to be extended into the remaining Stamford Street site, with its main staircase and lifts positioned and sized to serve the extension. Knock-through panels are included on each floor. Due to the growth of its programmes, there is no longer sufficient office space for all CSCB staff to come in on any day, and it has not been able to incorporate adequate hybrid working facilities.

- 3.3 To the north of the site is the ramped entrance to the underground public car park below the Iroko Housing. Beyond the car park ramp is the blank flank elevation of no. 51 Cornwall Road and Iroko Housing Co-operative's communal amenity space.
- 3.4 To the West, across Cornwall Road, stands Cornwall House, now occupied by King's College. To the southwest, across Stamford Street, is a similarly large early 20th century commercial building and to the immediate south, across Stamford Street a substantial Georgian terrace.
- 3.5 The site is outlined in red on the extract of the policies map below,



- 3.6 Site 8 is allocated in the Proposed Site Allocations Development Plan Document for the following uses:
- community/office floorspace at ground floor, providing an active frontage to Stamford Street
 - approximately 30 self-contained residential units.
- 3.7 The existing neighbourhood centre houses a family & children's centre (including a day nursery), and is the base for youth, family, healthy living and employment support programmes. It provides meeting and activity facilities and is where all CSCB staff are based. It is heavily used and run on the cross-subsidy model which underpins all CSCB public service delivery.
- 3.8 As well as CSCB's needs for more space for its staff, there are existing significant unmet needs in terms of community facilities in the neighbourhood, particularly in terms of youth, older

persons' and GP facilities. Also, as the residential population of the area continues to grow, there is greater pressure on existing services and the need for supplementary services.

- 3.9 For example, the Lower Marsh GP Surgery and the Lambeth Walk GP Surgery are being forced to leave their current sites and need to be relocated locally. The Lower Marsh GP Surgery is in the Waterloo area. We understand that the SE London Integrated Care Service are struggling to find local sites accessible to the local community for relocation purposes.
- 3.10 There is also a need to find a permanent home for the Waterloo Library, which is currently in temporary premises.
- 3.11 South Bank and Waterloo Neighbours (the local Neighbourhood Forum) is undertaking a review and audit of community facilities in the neighbourhood, and its findings will be available to inform the EIP and the Infrastructure Delivery Plan.
- 3.12 The needs that exist must be accommodated and the Site Allocations DPD needs to reflect this.
- 3.13 It is the intention of CSCB to develop 110 Stamford Street for further community uses.
- 3.14 The SA DPD proposes community/office space on the ground floor with 30 flats above. This does not prioritise community facilities nor make proper use of the investment CSCB has already made in the construction of the existing centre.
- 3.15 The capacity study by the architect (Haworth Tompkins) responsible for the award-winning adjacent developments - Iroko housing and the phase 1 neighbourhood centre - suggests a maximum of 20 flats could be satisfactorily accommodated on the 110 Stamford Street site under an 'all housing' option. This study also looked at an 'all community' and a mixed 'housing and community' option and was provided to the Council. This indicated that only four social rent homes would be able to be provided under the 'all housing' option.
- 3.16 In the light of the significant need for further community space and CSCB's conclusion that the site could only deliver a maximum of 4 social rent, CSCB's intention is to develop the site wholly for community purposes with other uses, for example Class E uses, only being included in any scheme for cross subsidy purposes.
- 3.17 CSCB and Haworth Tompkins are concerned that developing a building higher than the existing neighbourhood centre next door, which the council appear to be advocating, is not appropriate in the street scene and townscape and may have unfortunate impacts on Iroko Housing Co-operative. Also, pulling the block back from the street will leave a smaller footprint for the

accommodation and an extremely large area of pavement with no apparent purpose. CSCB considers that there should be no obligation to 'set back' in this way.

3.18 The Council state that their evidence base for the Site Allocations DPD includes a capacity study dated 2023 and a Viability Study by BNP Paribas, which includes office space of 1,399 sq m valued as if entirely commercial and 168 sq m of light industrial space. The appraisal does not include any community use or active frontage. The assumptions forming the basis for the viability study are unrealistic and therefore the viability appraisal itself must be inaccurate.

3.19 **CSCB will wish to review the aforementioned documents in full and provide further comment.**

3.20 The Site Allocations DPD approach to and allocation of 110 Stamford Street needs to be fundamentally altered to take account of CSCB's comments above. We suggest the following revised text:

Vision: Proposed Site 8: 110 Stamford Street SE1

The site provides an opportunity to contribute to the Waterloo Opportunity Area through an extension to the adjoining Coin Street Neighbourhood Centre. Uses are anticipated to be those that complement the existing services provided by the adjacent Neighbourhood Centre.

Development will address the current eyesore condition by completing the urban block. The design should complement the award-winning design of the Neighbourhood Centre.

Land uses

The site has potential to accommodate:

- *Community floorspace;*
- *Class E uses;*
- *an active frontage to Stamford Street.*

3.21 SADPD states 'The requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure should be addressed.' The provision of community facilities on the site, which is the priority for CSCB, will obviate any need for any further requirements. This should be acknowledged in the text. The principles would be the same in relation to open space.

3.22 The SADPD states *'Where possible the River Thames should be prioritised for the transportation of construction materials and waste during construction of the development...'*. This was a possibility some years ago, when CSCB asked the Council to pursue this with the IBM redevelopment (76-78 Upper Ground) and the adjacent ITV redevelopment (72 Upper Ground), two very large riverside schemes. The Council appears to have concluded that its project to improve the Upper Ground 'spine route' may have to be postponed until these two developments have been completed. It seems bizarre to suggest this approach to waste management for 110 Stamford Street which is not on the river but is on a main TfL trunk road.

4.0 Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1

4.01 Site 9 is outlined in red on the extract of the policies map below:



4.02 The Site is allocated in the Proposed Site Allocations DPD for the following:

- Mixed use redevelopment.
- Active frontage and cultural use on the ground floor.
- Upper levels to comprise offices/workspace and self-contained residential units. This may include an element of extra care housing where need is demonstrated.
- Uses at ground floor level on the northern, western and eastern perimeter of the site should include a range of small and medium sized units suitable for independent businesses and cultural uses, designed to activate new areas of public realm.

- 4.03 CSCB is currently prioritising the delivery of its Doon Street and Bernie Spain Gardens north developments.
- 4.04 Gabriels Wharf is to be the subject of investment so that the existing uses can remain for at least the next 10 years, with existing buildings and land immediately surrounding re-purposed to this end.
- 4.05 Princes' Wharf is leased to ITV until 2029 and then will be re-purposed for appropriate meanwhile uses. Accordingly, it is not envisaged to be available for redevelopment for at least 10 years.
- 4.06 It is important for the Site Allocation to refer to this position and to accept meanwhile uses as referred to above.
- 4.07 As the Council is aware, CSCB's longer term vision is to redevelop Site 9 for a nursing home together with associated enabling development to facilitate the nursing home. This is in response to a demonstrated demand to cater for those in need of nursing care locally, itself partly generated by the increase in the neighbourhood residential population initiated by CSCB in the 1980s and 1990s, and now amplified by many private residential developments.
- 4.08 CSCB commissioned Stanton Williams Architects to examine the feasibility of the accommodation of a nursing home with community facilities and a public square or 'piazza' on Gabriel's Wharf with an enabling workspace development on Princes Wharf. They considered that the site could accommodate a 76-bed nursing home, aimed at allowing local people who are no longer able to live in their own homes (because of dementia or other illnesses) to live close to their friends and in a neighbourhood with which they are familiar, together with 'step down' accommodation following time spent at St Thomas's Hospital. The scheme would include both communal facilities for residents of the nursing home and community facilities serving the wider residential population aimed at encouraging inter-generational support and programmes.
- 4.09 The social enterprise principle of cross-subsidy is intended to permit much of the nursing home and 'step down' provision to be offered at local authority and NHS rates. What CSCB is proposing is affordable accommodation to meet the needs of a particular segment of the local population - and therefore much more in line with neighbourhood needs than simply building homes for market sale with a small affordable component.
- 4.10 The recent Inspector's Report into the Lambeth Local Plan's stated the following (bold emphasis added):

'110. The issue of the potential need for additional nursing homes in Lambeth was the subject of considerable discussion during the hearing sessions and a SCG was signed and submitted by the principal parties. The Council's strategy towards nursing homes, supported by evidence from the NHS, is to continue to support people to remain independent for as long as possible in their own home, but when this is no longer possible, a fully residential nursing home or care home is needed. Also, the Council's submission is that there is no demand within the Borough for additional nursing home beds over the plan period.

*111. I also note that Guy's and St Thomas' NHS Foundation Trust has welcomed Coin Street Community Builders' proposal for a new nursing home, which has been backed by a report commissioned by the group. I am not, however, persuaded from the evidence submitted to the Examination that there is a compelling case for a new nursing home to meet Lambeth's needs, especially in relation to the Council's strategy as summarised above. **I therefore consider that this issue can appropriately be addressed at the forthcoming Draft Site Allocations Plan for Lambeth, which I understand is to be consulted on shortly, and that it is the intention of the Council to include the Coin Street site in that document.***

- 4.11 CSCB commissioned a report by Kingsbury Hill Fox on the needs assessment and planning of nursing and care homes. Kingsbury Hill Fox (KHF) are experts in this field. This demonstrated that predicted local demand from the three wards (one in Lambeth and two in Southwark) which make up CSCB's area of benefit would on its own be sufficient to take up all of the planned 76 bed spaces proposed for Site 9.
- 4.12 The figures used in the KHF report were based on ASD (Age Standardised Demand). Kingsbury Hill Fox, as well as by other consultants and authorities in this field, have used such a methodology for 25 years in many assignments for commissioners and operators and have found it highly accurate (and indeed more accurate than other forms of demand projection).
- 4.13 Their report explains, with evidence, that there is a clear unmet demand for nursing care homes within Lambeth. This need has been verified by the responses from the community and St Thomas's Hospital. Experts also believe that the identified need will increase over time, in line with ageing population, and diminishing availability of nursing care facilities.
- 4.14 Though CSCB understands the rationale for Lambeth's focus on housing provision suitable for older people to remain independent in their own homes for as long as possible, no evidence has been provided to counter the research submitted by CSCB that there would nevertheless be demand for a nursing home, including from Lambeth residents in this area.

Notwithstanding, it is noted that the Council's responses previously were based on a 2017 SHMA and there is now a more up to date document, Lambeth's Integrated Commissioning's Lambeth Market Position Statement 2023–2028. Some relevant sections of this are as follows: (with our emphasis added in underlining):

Direction of Travel (page 21)

Where residential accommodation is required, we anticipate that care in residential settings will predominantly meet the needs of Lambeth adults with more complex needs. This will include nursing care, dementia care (residential and nursing), and support for individuals with complex behavioural needs.

Ensuring sufficient availability of support for adults with dementia, both within the community and in residential or nursing settings.

And

What the data shows us about demand for care and support – key headlines: (page 22)

Lambeth's population is projected to continue to increase over the next 10 years, with the highest rate of increase in the older population groups (see graphic right: projected increase of c.30,000 in Lambeth adults aged 50+ from 2021 to 2031). We need to ensure that our care and support marketplace is responsive to the needs of a growing older people's population in years to come. We anticipate that this will present rising demand for care and support overall, with increasingly complex care needs for many individuals.

- 4.16 The adjacent table shows an increase in those over 65 in Lambeth from 30,124 in 2021 will increase by just over 50% to 45,233 by 2031, including an increase of those over 85 from 3164 to 4742, just under 50%.
- 4.17 A further table shows that in 2022 those needing nursing care were 13% of those aged 65+, rising to 14% of those aged 85+.
- 4.18 This section of the Market Position Statement goes on to state:

Most Lambeth adults live at home or in accommodation within the community, including 77% of Lambeth adults aged 65+. As the older population grows, we expect to see a further increase in the proportion of older people who are supported to continue living in the community. Where individuals require a care home placement due to the complexity of their needs, it is anticipated that a higher proportion of people will be supported in nursing settings.

And

What we want the health and care market to offer over the next five years: (pages 34-35)

- *We want Lambeth adults to have sustainable, good quality accommodation that meets their individual needs. We will continue to require a good mix of care and support models within the community and in residential or nursing settings where the local authority identifies that this level of support is needed.*
- *We expect the care home market to meet the needs of clients with highly complex needs, with a transition to supplying a greater amount of nursing relative to residential care: social care clients with lower levels of need will be supported in the community, meaning our care homes will predominantly support those with more complex needs. We are focused on developing our nursing care provision particularly.*

4.19 This Market Position Statement is to 2028 and as stated above, Site 9 will not be available for redevelopment for another 10 years, From the figures and priorities in the Market Position Statement and ongoing trends, it appears very likely that CSCB will be able to demonstrate a need for nursing accommodation in the latter part of the plan period when it may bring forward the full redevelopment of Site 9.

4.20 The Market Position Statement goes on to state:

We are focused on ensuring the availability of nursing care placements that offer value via sustainable pricing, recognising that we have seen a significant increase in pricing for nursing care placements in recent years.

4.21 This reflects the position that CSCB has consistently promoted with regard to its proposals for a nursing home on Site 9, that the CSCB social enterprise model, and the intention that other uses on the site will comprise enabling development, mean it will be possible to offer a high proportion of spaces at local authority rates.

4.22 CSCB remains disappointed that Lambeth has not been willing to engage with the evidence that there would be a local demand for these nursing places, across Lambeth and Southwark and hopes that it will in the future.

4.23 In addition, as referenced by the Inspector, there is continuing demand from Guy's and St Thomas' NHS Foundation Trust, which primarily serves SE London patients, for 'step-down' and flexible facilities.

4.24 CSCB's proposals are also supported locally by SoWN, the Elders Group and WCDG.

4.25 CSCB notes the statement in Annexe 3 of the Statement of Common Ground between Lambeth and Southwark that 'Southwark do not need a nursing home in the north of the

borough'. In a recent meeting between CSCB and senior Southwark officers in Commissioning and Adult Social Care officers, CSCB was able to explain that:

- CSCB's area of benefit for its community programmes and facilities covers both Waterloo and north Southwark, and that;
- what it seeks in the SA DPD is wording that includes a nursing home in the latter part of the Plan period 'where need can be demonstrated'.

4.26 The statements in the SoCG reflect Southwark's current and expected position in the light of the Council's current plans. However, it was noted and agreed between CSCB and Southwark that Southwark's position on need could change by the 2030s and that it would be happy to have a discussion with CSCB about need at the time any development proposals came forward.

4.27 In CSCB's view, therefore, the Southwark statement should not be seen as a reason to preclude the inclusion of a nursing home use for Site 9 'where need is demonstrated'.

4.28 The draft SADPD allocates Site 9 for 'cultural uses, offices, housing with affordable housing, and shops and restaurants fronting a new piazza'. This does not take account of CSCB's objectives or its assessment (supported by the Kingsbury Hill Fox study) of the future needs of the neighbourhood.

4.29 The SADPD states that, if office space is proposed on Site 9, Local Plan Policy ED2 on affordable workspace will apply. CSCB considers that there is not a priority need for affordable workspace in the Waterloo area at the pricing levels set out in Policy ED2 and that, instead, contributions to the nursing home and community facilities - including local parks - need to be prioritised.

4.30 In the light of all of the above, CSCB suggest that as Lambeth has now done with the extra care housing, the appropriate future land uses for Site 9 refer to nursing care accommodation 'where need can be demonstrated' leaving it open to assess and demonstrate the need at a later date. CSCB remain confident however that such a need will be demonstrated.

4.31 As such, CSCB proposes that an alteration to the proposed wording of the policy is made as shown in the text below. Proposed deleted text is shown as ~~striketrough~~ and new text shown as underscore.

"The site provides an opportunity for mixed-use redevelopment. On the ground floor active frontage and cultural uses should be provided wherever possible (taking account of sensitive

residential neighbours). On upper levels offices and/or workspace, and self-contained residential units are appropriate.

This may include ~~an element of~~ extra care housing or a nursing home where need is demonstrated.

In accordance with paragraph 2.4.6 of the London Plan 2021, new residential development on this site should complement and not compromise the strategic functions of the CAZ.

Uses at ground floor level on the northern, western and eastern perimeter of the site should include a range of small and medium-sized units suitable for independent businesses and cultural uses, designed to activate new areas of public realm.”

- 4.32 Turning to design, the SA DPD makes specific mention of increasing public realm to the east by ‘pulling back’ the footprint of the Gabriel’s Wharf development. The SA DPD appears to remove the Stanton Williams piazza between the new buildings on Prince’s Wharf and Gabriel’s Wharf and, instead, to extend Bernie Spain Gardens north. This destroys the essence of the Stanton Williams proposals, ignores the requirement for a piazza in Lambeth’s Local Plan, and flies in the face of 5 years consulting on, designing, gaining consent for, and starting to implement the Bernie Spain Gardens north scheme. CSCB consider this a very thoughtless intervention.
- 4.33 The SA DPD approach creates a single block on the proposed Site 9 which in effect reduces permeability between Upper Ground and the riverside walkway, long a cornerstone of Lambeth’s policy for this area.
- 4.34 The SA DPD refers to the existing mock Tudor building at Princes Wharf as a ‘positive contributor to the Conservation Area’ and that it is of ‘architectural or historic value’. However, it is pastiche, its structure is compromised, and its retention will compromise the ability to deliver the best laid out development on Site 9 and this needs to be acknowledged in the SA DPD. It should not be an obligation to retain the building.
- 4.35 The SA DPD also states ‘the building line to the eastern edge of the site should not harm the root protection zones or canopies of trees in Bernie Spain Gardens. Allowance should be made for the construction phase and also future growth of the trees’. The Evidence document that accompanies the SA DPD also states ‘Tree protection areas of the trees on Bernie Spain Gardens extend into the Gabriel’s Wharf site by approximately 9m’. The extent of the roots is not 9m. The Arboricultural Impact Statement agreed by the Council when it approved the plans for re-landscaping Bernie Spain Gardens north in 2019 identified a maximum of 2-3m encroachment of root protection areas onto the Gabriel’s Wharf site, within the area which would

in any case not be built on. The reference to 9m has no evidence base and so needs to be deleted.

72 Upper Ground was previously part of Site 9 but has not been included in the SA DPD. CSCB is very concerned that the SADPD does not contain a site-specific policy allocation for 72 Upper Ground. There is no certainty that the current planning permission for 72 Upper Ground will be built out and a 'plan led' system should be maintained to deal with any subsequent planning applications that are made on the site. Indeed, the Royal Street site still has an allocation despite a planning permission being in place.

- 4.37 The adopted Local Plan policy for this site includes key principles about creating new north south routes as part of the redevelopment. This principle needs to be enshrined in the SA DPD until any redevelopment of 72 Upper Ground is complete with these routes in place.

- 4.38 Of additional concern is the wording in the SA DPD for Site 9 that states '*New vibrant and attractive pedestrian routes should be created to the eastern and western boundaries of the site, giving access between Queen's Walk and Upper Ground.*' Previous principles have been that the western route is to be provided using land within the 72 Upper Ground site. It is not acceptable or reasonable that this policy obligation should now fall entirely on to Prince's Wharf and Gabriel's Wharf.

- 4.39 The SADPD states in relation to Site 9, '*Sensitive redevelopment designed to complement proposals for the neighbouring former ITV site at 72 Upper Ground can also improve the public realm at Queen's Walk, providing better activation to the river frontage; help increase the permeability of the area; and contribute positively to the townscape along this part of the South Bank.*' These principles (and indeed most of those listed on pages 52 – 55 of the SADPD) should be applied at 72 Upper Ground and the site be included in the SA DPD.

- 4.40 It is also noted that the SADPD states that redevelopment of Site 9 '*should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on Upper Ground. Development should ensure that the amenity value of Bernie Spain Gardens is not diminished by undue overshadowing or enclosure.*' The sensitivity of Bernie Spain Gardens to overshadowing from future development is also noted in the SA DPD Evidence document.

CSCB agrees that these principles are reasonable, but only if the same principles are applied to the redevelopment of 72 Upper Ground. If the existing planning permission for 72 Upper Ground is built out, it will be wholly inconsistent with the principles being applied to Site 9 in the

SA DPD. Further, it would cause daylight issues for any new residential development on Princes Wharf as well as harming the existing homes to the south.

London Borough of Lambeth

Consultation on Proposed Site Allocations Development Plan Document

Representations on behalf of Coin Street Community Builders

3rd May 2024

1.0 Introduction

1.1 Coin Street Community Builders (CSCB) is a social enterprise which owns 5.5 hectares of land in the Waterloo, South Bank and north Southwark area. The company is limited by guarantee whereby all the income generated is used to deliver public service objectives as opposed to being distributed to shareholders. As a result, CSCB's motivations and decision making is based on the real needs of the Waterloo and north Southwark neighbourhood it serves, not on considerations of traditional commercial developers. All members of CSCB live in this neighbourhood.

1.2 CSCB's freehold includes the following two sites which are identified in the Site Allocations Development Plan Document (SADPD):

- Proposed Site 8: 110 Stamford Street SE1
- Proposed Site 9: Gabriel's Wharf & Princes Wharf, Upper Ground SE1

2.0 The NPPF

Plan Making

2.1 Paragraphs 15 and 16 of the NPPF, December 2023 state (with our emphasis in **bold**):

*15. The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; **and a platform for local people to shape their surroundings.***

16. Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational **but deliverable**;*
- c) **be shaped by** early, proportionate and **effective engagement** between planmakers and **communities, local organisations, businesses, infrastructure providers and operators** and statutory consultees;*

- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.2 Paragraph 35 sets out the tests of soundness as follows and states that plans should be:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

2.3 The allocations for Sites 8 and 9, as set out in the draft Lambeth Site Allocations DPD are not in accordance with the NPPF as they:

- do not provide a platform for local people to shape their surroundings;
- are not deliverable; and
- have not been shaped by effective engagement with communities, local organisations, businesses and community infrastructure providers.

2.4 The draft allocations are wholly inconsistent with CSCB's approach to its assets and to real community needs. The Council has not recognised the special character of the landowner (and thus the deliverability of the Council's draft allocations), despite the fact that the Council is a partner with CSCB in many other matters and fully appreciates the nature of CSCB's character and objectives as an organisation in those activities.

The Council's evidence base for the allocations includes indicative capacity studies and viability appraisals developed on the basis that CSCB is a conventional developer. This is not realistic in two key ways:

- a) CSCB will not develop the sites in a way that does not reflect their assessment of local community needs, based on 40 years' experience of serving the neighbourhood.
 - b) It has been suggested by the Council that CSCB could develop these sites commercially with a developer along the lines of the site allocations and use the proceeds to support its community activities. This in turn fails to take account of three further key factors:
 - i) The 1984 transfer of the land from the GLC including these two sites includes covenants which preclude such an approach.
 - ii) It would be highly detrimental to CSCB's financial model to dispose of or capitalise the value of these sites – its community facilities and programmes, and the fulfilment of CSCB's obligations to manage and maintain large areas of heavily used South Bank public realm militate against such an approach to the land which forms the overwhelming majority of its asset base.
 - iii) It would rob the neighbourhood of scarce land that could otherwise serve priority community needs in an area subject to extensive commercial development and densification.
- 2.6 The Site Allocations DPD states that ...*'The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy.'* (para 1.2). In the case of Sites 8 & 9, the proposals in the SADPD do not do this. Instead, they are likely to deter development by CSCB.
- 2.7 The SADPD goes on to state *'There is also no need in Lambeth to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the revised Lambeth Local Plan. However, the new site allocation policies will help to accelerate delivery of housing in the borough, maintain the necessary pipeline of new housing and thereby ensure housing delivery targets continue to be achieved. They will also enable the timely renewal and optimisation of social infrastructure and commercial floorspace.'* (para 1.14). Again, in the case of Sites 8 & 9, the proposals in the SADPD will not do this: by ignoring CSCB's assessment of the *needs* of the neighbourhood it serves, the current draft SADPD discourages investment in these sites.

Meeting the needs of different groups in the community

- 2.8 Revisions made to the NPPF in December 2023 recognise the importance of Local Planning Authorities identifying housing need for different groups in the community, including for those who need care.

- 2.9 Paragraph 60 of the NPPF states,

*“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, **that the needs of groups with specific housing requirements are addressed** and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, **including with an appropriate mix of housing types for the local community.**” (Our emphasis)*

- 2.10 The revised NPPF encourages local planning authorities to act pro-actively and ensure that their policies are deliverable to address the identified needs of the community. This is reflected in paragraph 63 which states,

*“Within this context of establishing need, the size, **type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.** These groups should include (but are not limited to) those who require affordable housing; families with children; **older people (including those who require retirement housing, housing-with-care and care homes)**; students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes”. (Our emphasis)*

- 2.11 Planning Practice Guidance for Housing for Older and Disabled People pre-dates these changes to the NPPF. However, it acknowledges the increasing numbers of the elderly and states ‘People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is [projected to double to 3.2 million](#).’ The Guidance goes on to state ‘It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations.’

Paragraph 125 of the NPPF also provides further support by encouraging Local Planning Authorities to “...**take a proactive role in identifying and helping to bring forward land** that may be suitable for meeting development needs.....”(Our emphasis)

- 2.13 The Inspector's report on the Examination of the revised Lambeth Local Plan, with regard to need for a nursing home, stated at paragraph,

"I therefore consider that the issue can appropriately be addressed at the forthcoming Draft Site Allocations Plan for Lambeth, which I understand is to be consulted on shortly, and that it is the intention of the council to include Coin Street in that document."

- 2.14 The Site Allocations DPD does not meet the NPPF, in particular paragraph 126, which states,

*"Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan: a) it should, as part of plan updates, **reallocate the land for a more deliverable use that can help to address identified needs** (or, if appropriate, deallocate a site which is undeveloped); and b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area". (Our emphasis).*

3.0 Proposed Site 8: 110 Stamford Street SE1

- 3.1 The site is cleared down to basement floor level and enclosed by a hoarding. It has been subject to a series of interim uses since the demolition of a Boots office building in 1985.
- 3.2 Adjoining to the east is no. 108 Stamford Street - the Coin Street Neighbourhood Centre, which houses CSCB's staff, a children's centre, youth & community programmes, midwifery facilities, meeting and training facilities, and a restaurant. The site bounded by Stamford Street, Coin Street, Upper Ground and Cornwall Road was subject of a design competition won by Haworth Tomkins Architects and has been developed in phases, Iroko Housing Co-operative with its communal gardens was completed in 2001. The first phase of the Neighbourhood Centre was completed in 2007. That phase has been designed to be extended into the remaining Stamford Street site, with its main staircase and lifts positioned and sized to serve the extension. Knock-through panels are included on each floor. Due to the growth of its programmes, there is no longer sufficient office space for all CSCB staff to come in on any day, and it has not been able to incorporate adequate hybrid working facilities.

- 3.3 To the north of the site is the ramped entrance to the underground public car park below the Iroko Housing. Beyond the car park ramp is the blank flank elevation of no. 51 Cornwall Road and Iroko Housing Co-operative's communal amenity space.
- 3.4 To the West, across Cornwall Road, stands Cornwall House, now occupied by King's College. To the southwest, across Stamford Street, is a similarly large early 20th century commercial building and to the immediate south, across Stamford Street a substantial Georgian terrace.
- 3.5 The site is outlined in red on the extract of the policies map below,



- 3.6 Site 8 is allocated in the Proposed Site Allocations Development Plan Document for the following uses:
- community/office floorspace at ground floor, providing an active frontage to Stamford Street
 - approximately 30 self-contained residential units.
- 3.7 The existing neighbourhood centre houses a family & children's centre (including a day nursery), and is the base for youth, family, healthy living and employment support programmes. It provides meeting and activity facilities and is where all CSCB staff are based. It is heavily used and run on the cross-subsidy model which underpins all CSCB public service delivery.
- 3.8 As well as CSCB's needs for more space for its staff, there are existing significant unmet needs in terms of community facilities in the neighbourhood, particularly in terms of youth, older

persons' and GP facilities. Also, as the residential population of the area continues to grow, there is greater pressure on existing services and the need for supplementary services.

- 3.9 For example, the Lower Marsh GP Surgery and the Lambeth Walk GP Surgery are being forced to leave their current sites and need to be relocated locally. The Lower Marsh GP Surgery is in the Waterloo area. We understand that the SE London Integrated Care Service are struggling to find local sites accessible to the local community for relocation purposes.
- 3.10 There is also a need to find a permanent home for the Waterloo Library, which is currently in temporary premises.
- 3.11 South Bank and Waterloo Neighbours (the local Neighbourhood Forum) is undertaking a review and audit of community facilities in the neighbourhood, and its findings will be available to inform the EIP and the Infrastructure Delivery Plan.
- 3.12 The needs that exist must be accommodated and the Site Allocations DPD needs to reflect this.
- 3.13 It is the intention of CSCB to develop 110 Stamford Street for further community uses.
- 3.14 The SA DPD proposes community/office space on the ground floor with 30 flats above. This does not prioritise community facilities nor make proper use of the investment CSCB has already made in the construction of the existing centre.
- 3.15 The capacity study by the architect (Haworth Tompkins) responsible for the award-winning adjacent developments - Iroko housing and the phase 1 neighbourhood centre - suggests a maximum of 20 flats could be satisfactorily accommodated on the 110 Stamford Street site under an 'all housing' option. This study also looked at an 'all community' and a mixed 'housing and community' option and was provided to the Council. This indicated that only four social rent homes would be able to be provided under the 'all housing' option.
- 3.16 In the light of the significant need for further community space and CSCB's conclusion that the site could only deliver a maximum of 4 social rent, CSCB's intention is to develop the site wholly for community purposes with other uses, for example Class E uses, only being included in any scheme for cross subsidy purposes.
- 3.17 CSCB and Haworth Tompkins are concerned that developing a building higher than the existing neighbourhood centre next door, which the council appear to be advocating, is not appropriate in the street scene and townscape and may have unfortunate impacts on Iroko Housing Co-operative. Also, pulling the block back from the street will leave a smaller footprint for the

accommodation and an extremely large area of pavement with no apparent purpose. CSCB considers that there should be no obligation to 'set back' in this way.

- 3.18 The Council state that their evidence base for the Site Allocations DPD includes a capacity study dated 2023 and a Viability Study by BNP Paribas, which includes office space of 1,399 sq m valued as if entirely commercial and 168 sq m of light industrial space. The appraisal does not include any community use or active frontage. The assumptions forming the basis for the viability study are unrealistic and therefore the viability appraisal itself must be inaccurate.

- 3.19 **CSCB will wish to review the aforementioned documents in full and provide further comment.**

- 3.20 The Site Allocations DPD approach to and allocation of 110 Stamford Street needs to be fundamentally altered to take account of CSCB's comments above. We suggest the following revised text:

Vision: Proposed Site 8: 110 Stamford Street SE1

The site provides an opportunity to contribute to the Waterloo Opportunity Area through an extension to the adjoining Coin Street Neighbourhood Centre. Uses are anticipated to be those that complement the existing services provided by the adjacent Neighbourhood Centre.

Development will address the current eyesore condition by completing the urban block. The design should complement the award-winning design of the Neighbourhood Centre.

Land uses

The site has potential to accommodate:

- *Community floorspace;*
- *Class E uses;*
- *an active frontage to Stamford Street.*

- 3.21 SADPD states 'The requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure should be addressed.' The provision of community facilities on the site, which is the priority for CSCB, will obviate any need for any further requirements. This should be acknowledged in the text. The principles would be the same in relation to open space.

3.22 The SADPD states *'Where possible the River Thames should be prioritised for the transportation of construction materials and waste during construction of the development...'*. This was a possibility some years ago, when CSCB asked the Council to pursue this with the IBM redevelopment (76-78 Upper Ground) and the adjacent ITV redevelopment (72 Upper Ground), two very large riverside schemes. The Council appears to have concluded that its project to improve the Upper Ground 'spine route' may have to be postponed until these two developments have been completed. It seems bizarre to suggest this approach to waste management for 110 Stamford Street which is not on the river but is on a main TfL trunk road.

4.0 Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1

4.01 Site 9 is outlined in red on the extract of the policies map below:



4.02 The Site is allocated in the Proposed Site Allocations DPD for the following:

- Mixed use redevelopment.
- Active frontage and cultural use on the ground floor.
- Upper levels to comprise offices/workspace and self-contained residential units. This may include an element of extra care housing where need is demonstrated.
- Uses at ground floor level on the northern, western and eastern perimeter of the site should include a range of small and medium sized units suitable for independent businesses and cultural uses, designed to activate new areas of public realm.

- 4.03 CSCB is currently prioritising the delivery of its Doon Street and Bernie Spain Gardens north developments.

- 4.04 Gabriels Wharf is to be the subject of investment so that the existing uses can remain for at least the next 10 years, with existing buildings and land immediately surrounding re-purposed to this end.

- 4.05 Princes' Wharf is leased to ITV until 2029 and then will be re-purposed for appropriate meanwhile uses. Accordingly, it is not envisaged to be available for redevelopment for at least 10 years.

- 4.06 It is important for the Site Allocation to refer to this position and to accept meanwhile uses as referred to above.

- 4.07 As the Council is aware, CSCB's longer term vision is to redevelop Site 9 for a nursing home together with associated enabling development to facilitate the nursing home. This is in response to a demonstrated demand to cater for those in need of nursing care locally, itself partly generated by the increase in the neighbourhood residential population initiated by CSCB in the 1980s and 1990s, and now amplified by many private residential developments.

- 4.08 CSCB commissioned Stanton Williams Architects to examine the feasibility of the accommodation of a nursing home with community facilities and a public square or 'piazza' on Gabriel's Wharf with an enabling workspace development on Princes Wharf. They considered that the site could accommodate a 76-bed nursing home, aimed at allowing local people who are no longer able to live in their own homes (because of dementia or other illnesses) to live close to their friends and in a neighbourhood with which they are familiar, together with 'step down' accommodation following time spent at St Thomas's Hospital. The scheme would include both communal facilities for residents of the nursing home and community facilities serving the wider residential population aimed at encouraging inter-generational support and programmes.

- 4.09 The social enterprise principle of cross-subsidy is intended to permit much of the nursing home and 'step down' provision to be offered at local authority and NHS rates. What CSCB is proposing is affordable accommodation to meet the needs of a particular segment of the local population - and therefore much more in line with neighbourhood needs than simply building homes for market sale with a small affordable component.

- 4.10 The recent Inspector's Report into the Lambeth Local Plan's stated the following (bold emphasis added):

'110. The issue of the potential need for additional nursing homes in Lambeth was the subject of considerable discussion during the hearing sessions and a SCG was signed and submitted by the principal parties. The Council's strategy towards nursing homes, supported by evidence from the NHS, is to continue to support people to remain independent for as long as possible in their own home, but when this is no longer possible, a fully residential nursing home or care home is needed. Also, the Council's submission is that there is no demand within the Borough for additional nursing home beds over the plan period.

*111. I also note that Guy's and St Thomas' NHS Foundation Trust has welcomed Coin Street Community Builders' proposal for a new nursing home, which has been backed by a report commissioned by the group. I am not, however, persuaded from the evidence submitted to the Examination that there is a compelling case for a new nursing home to meet Lambeth's needs, especially in relation to the Council's strategy as summarised above. **I therefore consider that this issue can appropriately be addressed at the forthcoming Draft Site Allocations Plan for Lambeth, which I understand is to be consulted on shortly, and that it is the intention of the Council to include the Coin Street site in that document.***

- 4.11 CSCB commissioned a report by Kingsbury Hill Fox on the needs assessment and planning of nursing and care homes. Kingsbury Hill Fox (KHF) are experts in this field. This demonstrated that predicted local demand from the three wards (one in Lambeth and two in Southwark) which make up CSCB's area of benefit would on its own be sufficient to take up all of the planned 76 bed spaces proposed for Site 9.
- 4.12 The figures used in the KHF report were based on ASD (Age Standardised Demand). Kingsbury Hill Fox, as well as by other consultants and authorities in this field, have used such a methodology for 25 years in many assignments for commissioners and operators and have found it highly accurate (and indeed more accurate than other forms of demand projection).
- 4.13 Their report explains, with evidence, that there is a clear unmet demand for nursing care homes within Lambeth. This need has been verified by the responses from the community and St Thomas's Hospital. Experts also believe that the identified need will increase over time, in line with ageing population, and diminishing availability of nursing care facilities.
- 4.14 Though CSCB understands the rationale for Lambeth's focus on housing provision suitable for older people to remain independent in their own homes for as long as possible, no evidence has been provided to counter the research submitted by CSCB that there would nevertheless be demand for a nursing home, including from Lambeth residents in this area.

Notwithstanding, it is noted that the Council's responses previously were based on a 2017 SHMA and there is now a more up to date document, Lambeth's Integrated Commissioning's Lambeth Market Position Statement 2023–2028. Some relevant sections of this are as follows: (with our emphasis added in underlining):

Direction of Travel (page 21)

Where residential accommodation is required, we anticipate that care in residential settings will predominantly meet the needs of Lambeth adults with more complex needs. This will include nursing care, dementia care (residential and nursing), and support for individuals with complex behavioural needs.

Ensuring sufficient availability of support for adults with dementia, both within the community and in residential or nursing settings.

And

What the data shows us about demand for care and support – key headlines: (page 22)

Lambeth's population is projected to continue to increase over the next 10 years, with the highest rate of increase in the older population groups (see graphic right: projected increase of c.30,000 in Lambeth adults aged 50+ from 2021 to 2031). We need to ensure that our care and support marketplace is responsive to the needs of a growing older people's population in years to come. We anticipate that this will present rising demand for care and support overall, with increasingly complex care needs for many individuals.

- 4.16 The adjacent table shows an increase in those over 65 in Lambeth from 30,124 in 2021 will increase by just over 50% to 45,233 by 2031, including an increase of those over 85 from 3164 to 4742, just under 50%.
- 4.17 A further table shows that in 2022 those needing nursing care were 13% of those aged 65+, rising to 14% of those aged 85+.
- 4.18 This section of the Market Position Statement goes on to state:

Most Lambeth adults live at home or in accommodation within the community, including 77% of Lambeth adults aged 65+. As the older population grows, we expect to see a further increase in the proportion of older people who are supported to continue living in the community. Where individuals require a care home placement due to the complexity of their needs, it is anticipated that a higher proportion of people will be supported in nursing settings.

And

What we want the health and care market to offer over the next five years: (pages 34-35)

- *We want Lambeth adults to have sustainable, good quality accommodation that meets their individual needs. We will continue to require a good mix of care and support models within the community and in residential or nursing settings where the local authority identifies that this level of support is needed.*
- *We expect the care home market to meet the needs of clients with highly complex needs, with a transition to supplying a greater amount of nursing relative to residential care: social care clients with lower levels of need will be supported in the community, meaning our care homes will predominantly support those with more complex needs. We are focused on developing our nursing care provision particularly.*

4.19 This Market Position Statement is to 2028 and as stated above, Site 9 will not be available for redevelopment for another 10 years, From the figures and priorities in the Market Position Statement and ongoing trends, it appears very likely that CSCB will be able to demonstrate a need for nursing accommodation in the latter part of the plan period when it may bring forward the full redevelopment of Site 9.

4.20 The Market Position Statement goes on to state:

We are focused on ensuring the availability of nursing care placements that offer value via sustainable pricing, recognising that we have seen a significant increase in pricing for nursing care placements in recent years.

4.21 This reflects the position that CSCB has consistently promoted with regard to its proposals for a nursing home on Site 9, that the CSCB social enterprise model, and the intention that other uses on the site will comprise enabling development, mean it will be possible to offer a high proportion of spaces at local authority rates.

4.22 CSCB remains disappointed that Lambeth has not been willing to engage with the evidence that there would be a local demand for these nursing places, across Lambeth and Southwark and hopes that it will in the future.

4.23 In addition, as referenced by the Inspector, there is continuing demand from Guy's and St Thomas' NHS Foundation Trust, which primarily serves SE London patients, for 'step-down' and flexible facilities.

4.24 CSCB's proposals are also supported locally by SoWN, the Elders Group and WCDG.

4.25 CSCB notes the statement in Annexe 3 of the Statement of Common Ground between Lambeth and Southwark that 'Southwark do not need a nursing home in the north of the

borough'. In a recent meeting between CSCB and senior Southwark officers in Commissioning and Adult Social Care officers, CSCB was able to explain that:

- CSCB's area of benefit for its community programmes and facilities covers both Waterloo and north Southwark, and that;
- what it seeks in the SA DPD is wording that includes a nursing home in the latter part of the Plan period 'where need can be demonstrated'.

4.26 The statements in the SoCG reflect Southwark's current and expected position in the light of the Council's current plans. However, it was noted and agreed between CSCB and Southwark that Southwark's position on need could change by the 2030s and that it would be happy to have a discussion with CSCB about need at the time any development proposals came forward.

4.27 In CSCB's view, therefore, the Southwark statement should not be seen as a reason to preclude the inclusion of a nursing home use for Site 9 'where need is demonstrated'.

4.28 The draft SADPD allocates Site 9 for 'cultural uses, offices, housing with affordable housing, and shops and restaurants fronting a new piazza'. This does not take account of CSCB's objectives or its assessment (supported by the Kingsbury Hill Fox study) of the future needs of the neighbourhood.

4.29 The SADPD states that, if office space is proposed on Site 9, Local Plan Policy ED2 on affordable workspace will apply. CSCB considers that there is not a priority need for affordable workspace in the Waterloo area at the pricing levels set out in Policy ED2 and that, instead, contributions to the nursing home and community facilities - including local parks - need to be prioritised.

4.30 In the light of all of the above, CSCB suggest that as Lambeth has now done with the extra care housing, the appropriate future land uses for Site 9 refer to nursing care accommodation 'where need can be demonstrated' leaving it open to assess and demonstrate the need at a later date. CSCB remain confident however that such a need will be demonstrated.

4.31 As such, CSCB proposes that an alteration to the proposed wording of the policy is made as shown in the text below. Proposed deleted text is shown as ~~striketrough~~ and new text shown as underscore.

"The site provides an opportunity for mixed-use redevelopment. On the ground floor active frontage and cultural uses should be provided wherever possible (taking account of sensitive

residential neighbours). On upper levels offices and/or workspace, and self-contained residential units are appropriate.

This may include ~~an element of~~ extra care housing or a nursing home where need is demonstrated.

In accordance with paragraph 2.4.6 of the London Plan 2021, new residential development on this site should complement and not compromise the strategic functions of the CAZ.

Uses at ground floor level on the northern, western and eastern perimeter of the site should include a range of small and medium-sized units suitable for independent businesses and cultural uses, designed to activate new areas of public realm.”

- 4.32 Turning to design, the SA DPD makes specific mention of increasing public realm to the east by ‘pulling back’ the footprint of the Gabriel’s Wharf development. The SA DPD appears to remove the Stanton Williams piazza between the new buildings on Prince’s Wharf and Gabriel’s Wharf and, instead, to extend Bernie Spain Gardens north. This destroys the essence of the Stanton Williams proposals, ignores the requirement for a piazza in Lambeth’s Local Plan, and flies in the face of 5 years consulting on, designing, gaining consent for, and starting to implement the Bernie Spain Gardens north scheme. CSCB consider this a very thoughtless intervention.
- 4.33 The SA DPD approach creates a single block on the proposed Site 9 which in effect reduces permeability between Upper Ground and the riverside walkway, long a cornerstone of Lambeth’s policy for this area.
- 4.34 The SA DPD refers to the existing mock Tudor building at Princes Wharf as a ‘positive contributor to the Conservation Area’ and that it is of ‘architectural or historic value’. However, it is pastiche, its structure is compromised, and its retention will compromise the ability to deliver the best laid out development on Site 9 and this needs to be acknowledged in the SA DPD. It should not be an obligation to retain the building.
- 4.35 The SA DPD also states ‘the building line to the eastern edge of the site should not harm the root protection zones or canopies of trees in Bernie Spain Gardens. Allowance should be made for the construction phase and also future growth of the trees’. The Evidence document that accompanies the SA DPD also states ‘Tree protection areas of the trees on Bernie Spain Gardens extend into the Gabriel’s Wharf site by approximately 9m’. The extent of the roots is not 9m. The Arboricultural Impact Statement agreed by the Council when it approved the plans for re-landscaping Bernie Spain Gardens north in 2019 identified a maximum of 2-3m encroachment of root protection areas onto the Gabriel’s Wharf site, within the area which would

in any case not be built on. The reference to 9m has no evidence base and so needs to be deleted.

72 Upper Ground was previously part of Site 9 but has not been included in the SA DPD. CSCB is very concerned that the SADPD does not contain a site-specific policy allocation for 72 Upper Ground. There is no certainty that the current planning permission for 72 Upper Ground will be built out and a 'plan led' system should be maintained to deal with any subsequent planning applications that are made on the site. Indeed, the Royal Street site still has an allocation despite a planning permission being in place.

- 4.37 The adopted Local Plan policy for this site includes key principles about creating new north south routes as part of the redevelopment. This principle needs to be enshrined in the SA DPD until any redevelopment of 72 Upper Ground is complete with these routes in place.

- 4.38 Of additional concern is the wording in the SA DPD for Site 9 that states '*New vibrant and attractive pedestrian routes should be created to the eastern and western boundaries of the site, giving access between Queen's Walk and Upper Ground.*' Previous principles have been that the western route is to be provided using land within the 72 Upper Ground site. It is not acceptable or reasonable that this policy obligation should now fall entirely on to Prince's Wharf and Gabriel's Wharf.

- 4.39 The SADPD states in relation to Site 9, '*Sensitive redevelopment designed to complement proposals for the neighbouring former ITV site at 72 Upper Ground can also improve the public realm at Queen's Walk, providing better activation to the river frontage; help increase the permeability of the area; and contribute positively to the townscape along this part of the South Bank.*' These principles (and indeed most of those listed on pages 52 – 55 of the SADPD) should be applied at 72 Upper Ground and the site be included in the SA DPD.

- 4.40 It is also noted that the SADPD states that redevelopment of Site 9 '*should be designed to cause no unacceptable impacts on existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution. Particular regard should be paid to the relationship with sensitive residential neighbours on Upper Ground. Development should ensure that the amenity value of Bernie Spain Gardens is not diminished by undue overshadowing or enclosure.*' The sensitivity of Bernie Spain Gardens to overshadowing from future development is also noted in the SA DPD Evidence document.

CSCB agrees that these principles are reasonable, but only if the same principles are applied to the redevelopment of 72 Upper Ground. If the existing planning permission for 72 Upper Ground is built out, it will be wholly inconsistent with the principles being applied to Site 9 in the

SA DPD. Further, it would cause daylight issues for any new residential development on Princes Wharf as well as harming the existing homes to the south.

From: Daniel Botten [REDACTED]
Sent: 03 May 2024 15:06
To: SADPD
Cc: [REDACTED]
Subject: Lambeth - Site Allocations DPD - Reg. 19 Consultation - Reps OBO Unite Group Plc
Attachments: 240503 - Kennington Lane - Draft SADPD - Reps OBO Unite - FINAL + Appendices.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Green category

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Dear Lambeth,

Please find attached representations, on behalf of our client Unite Group Plc, to the draft Site Allocations Development Plan Document Reg. 19 Consultation.

We would appreciate confirmation of safe receipt and please do not hesitate to contact myself or Matthew (cc'd) with any queries.

Kind regards,
Dan

ROK
PLANNING

Daniel Botten
Associate Director

E: [REDACTED]

51-52 St. John's Square, London, EC1V 4JL



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REF: R00897/DB/MR

VIA EMAIL: sadpd@lambeth.gov.uk

London Borough of Lambeth
Planning Policy and Place Shaping
P.O. Box 80771
London
SW2 9QQ

3 May 2023

Dear Sir/Madam,

**REPRESENTATIONS TO SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT PROPOSED
SUBMISSION VERSION (SADPD PSV)
ON BEHALF OF UNITE GROUP PLC**

I write on behalf of our client, Unite Group Plc (Unite), to submit representations to the consultation on the Lambeth Site Allocations Development Plan Document Proposed Submission Version (SAPD PSV)

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes to 74,000 students across 177 properties in 27 leading university towns and cities. In London, Unite provide homes to circa 12,712 students across 32 properties with further schemes under consideration at full application and pre-application stages.

Indeed, Unite are engaged in pre-application discussions with both Lambeth and the GLA in respect of proposed site allocation 7: 6–12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11 (Site 7). Importantly, Unite's current proposals are situated on a portion of the proposed Site 7 only, with the remaining plot falling within a separate ownership. The portion of the site on which Unite's proposals are situated is shown edged red on the location plan enclosed at Appendix A.

There representations focus on the proposed allocation of Site 7 specifically, and are arranged as follows:

- Proposed Site Allocation Context;
- Phased Development;
- Proposed Land Uses:
 - Residential;
 - Industrial;
 - Community;

- Summary on proposed land uses;
- Townscape and Design;
 - Tall Building;
 - Kennington Lane Frontage;
- Transport and Highways;
- Other Comments; and
- Conclusion.

Site Allocation Context

In the first instance, Unite register their full support for the allocation of Site 7. Site 7 is an under-utilised and low-density brownfield site in a highly sustainable location. As acknowledged by the draft SAPD PSV, Site 7 has a PTAL rating of 6B and is located within walking distance of numerous public transport facilities including Elephant and Castle Rail and Tube and Kennington Tube, various bus stops, and cycle hire docking stations. In addition, whilst falling outside, Site 7 is very close to the boundary of the Central Activities Zone, The Elephant and Castle Opportunity Area and the Elephant and Castle Town Centre (falling within the London Borough of Southwark boundary). It therefore presents an excellent opportunity for high density development in accordance with paragraph 128 of the National Planning Policy Framework (NPPF) which sets out that development should make efficient use of land taking into account, amongst other factors, the identified need for different types of housing and other forms of development, the availability of land suitable for accommodating it, and the availability and capacity of infrastructure and services. Indeed, paragraph 129 of the NPPF notes that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site (with reference to the optimisation of land in city centres and other locations that are well served by public transport).

Notwithstanding that Unite register full support for the allocation of Site 7, a number of comments in respect of the SAPD PSV wording itself are provided within the remainder of this letter.

Phased Development

As noted earlier in this letter, Unite's current proposals are situated on a portion of the proposed Site 7 only. This portion includes 6-12 Kennington Lane (currently in use as a Jewsons) and the Christ the Redeemer Building (vacant but formerly in use as a language school) and is shown edged red on the location plan enclosed at Appendix A. The remaining portion of the site, known as Wooden Spoon House and in use for medical services, falls within a separate ownership. In this respect, it is important to note the following:

- The remaining portion of the Site is not being marketed for sale or re-development, with the current owners/occupiers intending to remain in situ; and

- This is evidenced by a recent planning application submitted on 7th March 2024 and approved on 1st May 2024 for the installation of solar panels on the rooftop of Wooden Spoon House.

On this basis, it can be concluded that it will likely be necessary to bring forward the development of Site 7 in a phased manner. Unite therefore suggest that, based on this context, it is vital that the SAPD PSV wording provides for the possibility of the overall site coming forward in phases. In that respect, Unite broadly support the inclusion of the following wording:

“However, given the two separate land ownerships, the site may come forward in two phases, in which case each phase should contribute to and help deliver the overall vision for the site as a whole. Proposals for any part of the site should not compromise or restrict delivery of the overall vision or the ability of the other site to optimise its development capacity.”

However, notwithstanding this, Unite suggest that the wording should be amended to acknowledge that proposed Site 7 is likely to come forward in two phases, and that the key consideration in assessing any planning application that comes forward in this manner will be to evidence that any development on one part of the site would not compromise the ability of the other to optimise its development capacity.

Proposed Land Uses

Residential

The SAPD PSV wording suggests that the site has the potential to accommodate approximately 115 to 125 self-contained residential units. Importantly, it continues to state the following:

“Proposals for non-self-contained housing will be considered against relevant London Plan and Local Plan policies.”

In the first instance, Unite register their support for the inclusion of the above wording within the SAPD PSV. In the first instance it is notable that no other draft site allocations included within the SAPD PSV include such wording. In other words, Site 7 is the only draft allocation within the SA DPD that is not explicitly appropriate for self-contained housing only. On this basis, it is considered that Site 7 can be interpreted to be the only draft site allocation seen as potentially appropriate for PBSA (subject to meeting relevant policies). This is considered highly relevant noting the identified need for additional student bedspaces in London.

Indeed, it is recognised within national (NPPG Para 034) and regional planning policy (London Plan para 4.15.1) that PBSA contributes to the delivery of housing overall. The Housing Delivery Test Rulebook explains that this contribution is on the basis of a 2.5 bedspace to 1 dwelling ratio. It is similarly acknowledged within policy H7 of the Lambeth Local Plan that PBSA makes an important contribution to the diversity of housing in Lambeth, and Lambeth's Housing Topic Paper notes that the housing targets set for the Borough in the London Plan include an allowance for delivery from non-self-contained

residential accommodation such as PBSA. Notably, a recent planning decision by Haringey Council (LPA ref. HGY/2023/2306 & HGY/2023/2307 at 'Printworks' 819-829 High Road, Tottenham, London, N17 8ER) acknowledged that the London PBSA market currently does not come close to providing the amount of accommodation required to house London's students, with c.310,000 students having to find accommodation outside of this purpose-built sector. The committee report references the supporting text of Policy H1 of the London Plan, stating:

"... non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. The proposed scheme would therefore deliver 114 new homes (net gain of 101 homes) based on this ratio. As such, the loss of the existing 13 homes would be acceptable in principle given the uplift and net gain of 101 homes."

Notwithstanding that PBSA is a form of housing and contributes towards housing supply, the following is particularly relevant in respect of Site 7:

- The development is in a location that is well-connected to local services with excellent public transport accessibility (PTAL 6), in accordance with part v. of policy Lambeth Local Plan policy H7 and part B of London Plan policy H15;
- Given the layout and size of student bedrooms, PBSA developments are generally more dense than conventional residential schemes and a higher number of persons can be accommodated on a site;
- At this site, there are competing demands in respect of the required quantum of replacement industrial floorspace, the required quantum of replacement community floorspace, a requirement for on-site servicing, and various design requirements. This is best illustrated on the 'Scheme Requirements' Plan enclosed at Appendix B; and
- PBSA is often better suited to co-location with industrial uses, with Unite having experience of delivering similar developments such as St Pancras Way, Kings Cross.

Therefore, not only is it the case that PBSA would contribute towards housing supply, it is also the case that PBSA may be a use more suited to this site specifically in order to ensure optimisation of the land.

Taking the above into account, whilst the current wording that proposals for non-self-contained housing will be considered against relevant London Plan and Local Plan policies is supported, given the fact that PBSA is a form of housing, contributes towards housing supply, and would be a highly appropriate development solution for this site specifically, Unite recommend that the wording is updated as follows:

"Proposals for non-self-contained housing, including purpose-built student accommodation, are considered appropriate in principle subject to assessment against relevant London Plan and Local Plan policies."

Moreover, as discussed earlier, it is likely that Site 7 will be required to come forward in phases. On that basis, part of the site could come forward for PBSA whilst the remainder could come forward for conventional residential at a later date.

Industrial

The draft SAPD PSV wording requires that replacement industrial floorspace is provided in order to achieve no net loss of industrial capacity.

In principle, Unite support the requirement for the re-provision of industrial space and have successfully delivered such schemes, including co-location with PBSA, elsewhere in London previously. However, Unite make a number of comments in relation to the SAPD PSV wording specifically below.

The following should be noted in respect of the requirement for replacement industrial space:

- The existing land at 6-12 Kennington Lane is currently in use as a Jewsons builders merchant;
- On that basis, the existing use is likely sui generis with the premises offering both light industrial (Use Class E(g)(iii)) and storage and distribution (Use Class B8) functions;
- In a number of instances, the current SAPD PSV wording refers to a requirement for replacement 'light industrial' space only (Use Class(g)(iii));
- However, the wording refers later to 'storage and distribution uses';
- And, in fact, the wording references the location of the site within the Central Services Area and encourages exploration of accommodating last mile distribution/logistics or 'just-in-time' servicing on site (Use Class B8).

Therefore, when reading the wording of the allocation of Site 7 within the SAPD PSV as a whole, it can be construed that both light industrial and storage and distribution uses would be supported as replacement industrial space. This would align with the requirements of co-location of industrial uses with residential (i.e. excluding industrial uses falling within Use Class B2). Nevertheless, for clarity, Unite suggest that the main wording is updated to refer to "*replacement industrial space (light industrial and/or storage and distribution uses)*", as opposed to "*light industrial*" alone.

Furthermore, Unite support the inclusion of reference to storage and distribution uses such as last mile distribution. However, Unite would question the inclusion of the following wording:

"Applicants should demonstrate in their proposals how the potential for including these uses has been considered and explain the outcome of that consideration."

Unite consider that the inclusion of such wording effectively outlines a preference for such uses to be delivered over any other industrial use. Such a preference conflicts with expert market advice obtained by Unite and indeed the advice provided by LB Lambeth planning officers via pre-application

engagement, which instead suggests that the required replacement industrial space should be designed so as to be as flexible and as appealing as possible. Unite take a similar position and thus recommend that, whilst wording setting out that the provision of uses such as last mile distribution would be appropriate is supported, the overall wording should be amended to emphasise that the essential requirement is that any replacement industrial space is designed so as to be genuinely usable and attractive to a variety of industrial occupiers.

In addition, Unite support the inclusion within the SAPD PSV wording that replacement industrial space *“should include operational yard space where feasible”*. Unite suggest that the wording is updated to clarify that the provision of operational yard space contributes to the overall replacement provision of industrial capacity, whilst also highlighting that “through careful design there can be scope to internalise yard space” in accordance with the draft Industrial Land and Uses London Plan Guidance.

Finally, Unite understand that the 2,200sqm figure has been formed based on an estimation of the overall site area measurement. Unite’s detailed investigations as part of pre-application discussions, including surveys, suggest that the overall site area is in fact 3,282sqm. This results in a 65% plot ratio being equivalent to 2,133sqm. Therefore, Unite suggest that the wording is amended to acknowledge that the 2,200sqm figure is based on an estimation only and the final quantum of replacement industrial space required will be considered at planning application stage.

Community

The draft SAPD PSV wording also requires a replacement community use of *“equivalent or better functionality to the existing space within the Christ the Redeemer building”*.

In the first instance, Unite support the principle of replacement community space. However, Unite would raise the following:

- Via pre-application advice, LB Lambeth officers have confirmed that under point ii. of policy S1, a lesser quantum of community space can be re-provided so long as this provides an equivalent or better functionality. Unite would suggest that the SAPD PSV explicitly acknowledges that equivalent or better functionality does not necessarily refer solely to quantum of floorspace; and
- Via pre-application discussions and early community engagement, the demand for a community facility in this location has been questioned. Unite would suggest that the potential for a payment in lieu to be provided, to support existing or proposed community space initiatives elsewhere, could provide a more effective outcome and greater community benefit than re-providing community space on site.

Unite suggest that it is necessary to consider the above alongside the competing demand for space on a constrained site and acknowledge that including an element of flexibility may result in the delivery of a scheme of greater benefit.

Summary on Proposed Land Uses

Broadly, Unite support the principle of the proposed land uses outlined within the SAPD PSV.

However, the overarching concern that forms the background to Unite's more specific comments (as detailed above) is that the Site is highly constrained in respect of available area. This, coupled with the intensive delivery requirements including a requirement for replacement industrial space, informs Unite's more specific representations (for example the suggestion to highlight the appropriateness of the Site for PBSA and the potential for a payment in lieu in respect of replacement community space). The competition for available area is best illustrated on the 'Scheme requirements' plan included at Appendix B. It is considered that the suggestions made would provide a more flexible approach to development of the site whilst maintaining the principles of the overall vision and delivering sustainable development.

Townscape and Design

Tall Building

The SAPD PSV indicatively identifies Site 7 as being appropriate for a tall building. Unite support the identification of the site as being appropriate for a tall building and indeed have undertaken significant design investigations as part of pre-application discussions which support this conclusion. Particularly, Unite support the conclusion as quoted in pre-application advice received from LB Lambeth that a building of 50m is not considered to cause heritage harm in principle.

However, Unite would emphasise that the indicative location for the tall building, as shown in the SAPD PSV, should indeed be treated as indicative only. The exact positioning of the tall building should be informed by detailed site investigation (including a TVIA and Daylight and Sunlight) as part of individual planning applications.

Unite also suggest that the wording of the SAPD PSV should make clear that it is not necessary for the site to come forward comprehensively in order to deliver a tall building so long as, as addressed earlier in this letter, the ability of the remaining plot to optimise its development capacity is not compromised.

Lastly, Unite would flag that the scheme located at Woodlands Nursing Home, 1 Dugard Way, London, SE11 4TH, which has a resolution to grant planning permission dating from 27th June 2023 and lies just to the north of Site, is a relevant neighbouring scheme that should be referenced within the 'neighbour context' section.

Kennington Lane Frontage

The SAPD PSV states that the development should include ground floor façade activation, particularly along Kennington Lane. Whilst Unite support the principle of activating the Kennington Lane façade it is necessary to consider the following:

- As detailed earlier in this letter, the site is highly constrained and there are a number of competing delivery requirements on the site (as illustrated by the Plan enclosed at Appendix B);
- Given the quantum of industrial uses to be replaced, a significant proportion of the ground floor of any scheme is required to be dedicated to this use; and
- Owing to the nature of industrial space, and noting the essential requirement to ensure that any space provided is both flexible, usable, and attractive to a number of occupiers, providing significant levels of façade activation at ground floor is unlikely to be practical.

On that basis, Unite suggest that the wording is amended to simply encourage ground floor façade activation where possible. Generally, as addressed earlier in this letter, Unite emphasise that given the site constraints it is necessary to weigh all design and land use requirements on balance and provide flexibility to ensure that development can come forward.

Transport and Highways

Unite support the provision of a car free development noting the sustainable nature of Site 7. In addition, Unite support the retention of Renfrew Road as the primary north-south pedestrian route.

However, Unite raise a concern in respect of the following wording concerning transport, movement and public realm:

“No vehicular access or servicing should be provided from Dugard Way, although pedestrian access is required. Any partial redevelopment of the site should ensure that later phases can also be serviced from Kennington Lane rather than Dugard Way.”

As discussed earlier in this letter, the nature of Site 7 results in a number of competing delivery requirements on a constrained site. And, in addition, it is likely that the site will be required to come forward in phases. A requirement to ensure that both elements of the site are serviced from Kennington Lane constrains the site even further and increases the competition for available area. Unite note that the Wooden Spoon House site is currently serviced from Dugard Way under the existing situation, whilst the front portion of the site is serviced from Kennington Lane via two entry/exit points. Unite suggest that the continuation of this arrangement as part of any re-development should be supported.

This would enable separate access and servicing areas to be provided for each portion of the site. In turn, this would reduce the competition for available area between land uses and facilitate a better

designed scheme. Indeed, when considering competition for available area it is necessary to view transport and highways requirements as a competing factor (both in respect of available area for access and servicing and in terms of the quantum of space required to provided policy compliant levels of cycle parking). This is illustrated via the Plan enclosed at Appendix B.

Furthermore, Unite note that the SAPD PSV sets out a requirement that development should widen the footpath along the Kennington Lane frontage. The wording states that *“this is particularly important with any tall building proposal to ensure adequate circulation space around the tallest part and to avoid an inappropriate canyon effect on Kennington Lane”*. In this respect, Unite highlight again the competing requirements on a constrained site whilst also flagging that, subject to the location of the tall building and the design approach, a canyoning effect can be mitigated in alternative ways. On that basis, Unite suggest that the wording is amended to require the mitigation of a canyoning effect, rather than to explicitly require the widening of the footway.

Other Comments

As noted earlier in this letter, the two portions of Site 7 are already separate. They are split in part by a truncated section of the former workhouse boundary wall. The Design Evidence paper supporting the allocation of Site 7 states the following:

“It is a high, stock brick structure with some red brick dressings. Whilst of some character, and evidence of the extent of the workhouse’s original grounds, it is considered to have limited heritage value (truncated, and now severed from the surviving historic workhouse buildings by modern development) and is not considered to be a non designated heritage asset, although it has significant character.”

Unite support the conclusion that the wall has low heritage value. Unite suggest that the wall and the conclusions made in the Design Evidence Paper are acknowledged and repeated within the SAPD PSV wording itself.

In addition, in respect of other heritage assets, the SAPD PSV states the following:

“The Cottingham Close Council Estate to the South has been identified by the Council as being worthy of consideration as a potential post-war conservation area.”

Unite understand that the Cottingham Close Council Estate is not currently a conservation area. There is no information that is publicly available that suggests that the designation of the estate as a Conservation Area has progressed. On that basis, Unite consider the inclusion of this wording within the SAPD PSV as premature and suggest that it is removed.

Lastly, Unite suggest that wording is added within the SAPD PSV wording that acknowledges that any viable scheme, including the indicative scheme tested as part of the draft allocation, is likely to have

some impacts (for example on daylight and sunlight and overshadowing). This is acknowledged within the evidence base but is not reflected within the SAPD PSV wording itself. The wording should emphasise that any scheme should seek to minimise these impacts, for assessment as part of any planning application.

Conclusion

As set out within this letter, Unite support the allocation of Site 7. Unite also support many of the principles including within the SAPD PSV as drafted. The site is a highly sustainable brownfield site which presents an excellent opportunity to deliver a high quality sustainable development.

However, Unite make a number of suggestions within this letter. The suggestions have been formed taking into account the following key factors:

- The ownership of the site is split and it is likely that any development will be required to come forward in phases;
- As illustrated via the plan enclosed at Appendix B, there are a number of competing requirements across a constrained site; and
- It is necessary to weigh these requirements on balance in order to ensure that the site is optimised for sustainable development that delivers on the vision for the allocation as a whole.

Unite consider that the delivery of a PBSA-led mixed-use scheme alongside replacement industrial and community space and incorporating suitable access and servicing in accordance with the comments made in this letter, presents the optimal solution for delivery of a sustainable scheme on this constrained site opportunity. Such a scheme would deliver the vision set out within the SAPD PSV document and provide numerous social, economic and environmental benefits. Unite look forward to exploring such a proposal further with LB Lambeth and the GLA via continuing pre-application discussions.

Unite reserve the right to participate and comment further as part of the Examination in Public.

I trust the above representations are in order and look forward to confirmation of their safe receipt. Please do not hesitate to contact myself or Daniel Botten [REDACTED] should you have any queries or wish to discuss these.

Yours faithfully,



Matthew Roe
Director



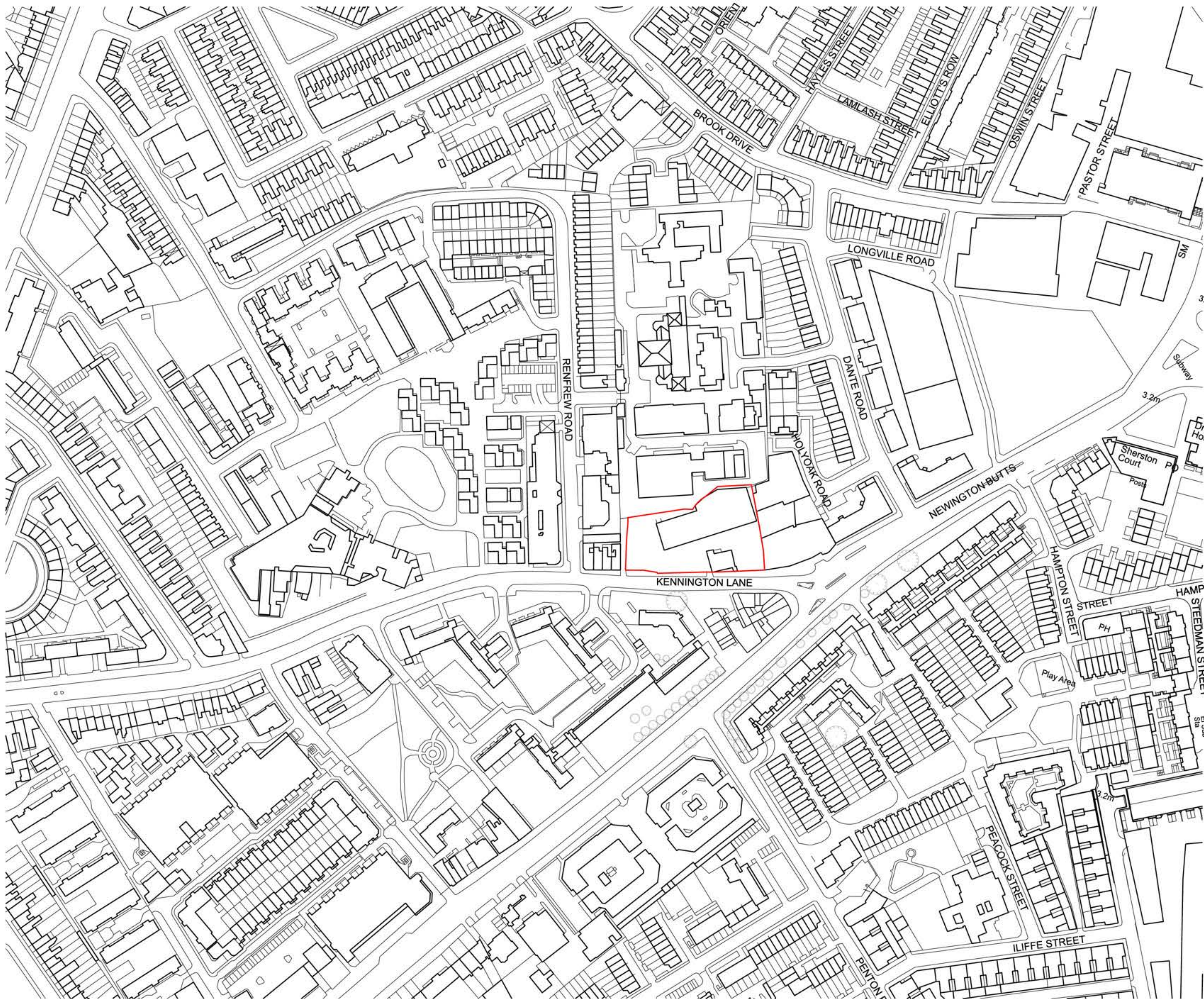
ROK Planning
51-52 St. John's Square
London
EC1V 4JL

ROK Planning Ltd

T: [REDACTED]

E: [REDACTED]

APPENDIX A



notes

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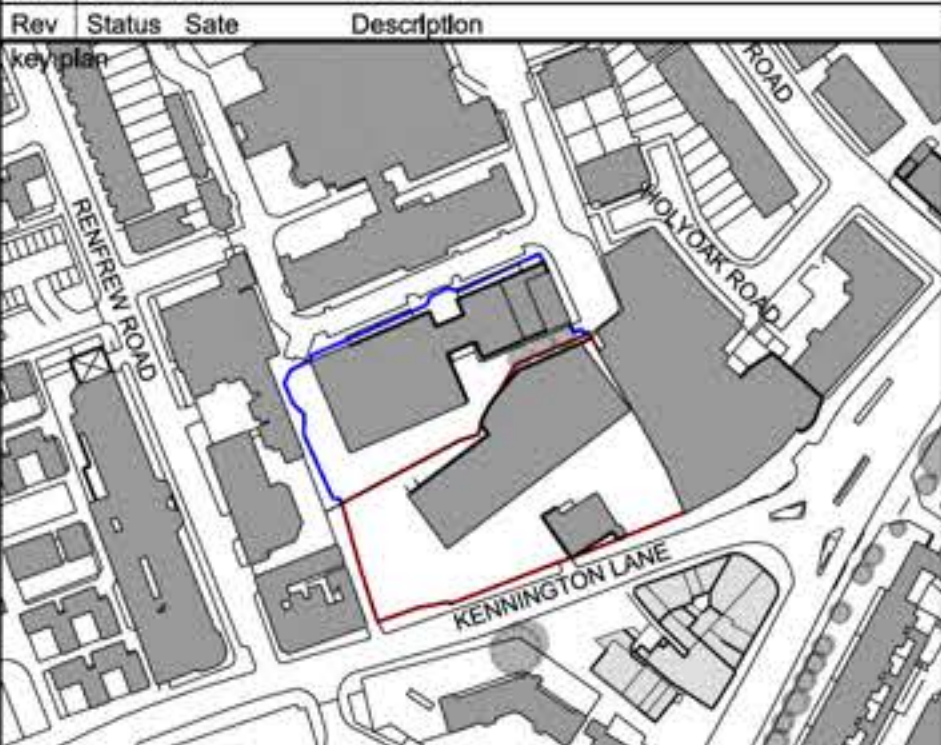
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The drawing shows the general arrangement together with the nominal sizes of selected elements and components. The information shown indicates the design intent of the architect and is to be read in conjunction with the performance specification. The Contractor must include for all design development and coordination required to complete the works.

Site Boundary



10M 50M



ALLFORD HALL MONAGHAN MORRIS
ARCHITECTS Ltd.
MORELANDS, 5-23 OLD STREET LONDON EC1V 9HL
TEL 020 7251 5261 FAX 020 7251 5123 WEB WWW.AHMM.CO.UK

client
UNITE STUDENTS

project name
KENNINGTON LANE

drawing title
SITE LOCATION PLAN

drawn	checked	scale	status			
MC	SS	1:1250 @ A1	PLANNING			
project	originator	volume	level	type	role	drawing no.
23038	AHMM	ZZ	00	DR	A	PL001

APPENDIX B

SCHEME REQUIREMENTS

2,133 Sqm Light Industrial
40 Sqm Refuse (BoH)
150 Sqm (minimum) of Student Accommodation Entrance
100 Sqm Student Accommodation Servicing
25 Sqm x 2 UKPN (BoH)
Community Space

Not Included:
Fire Escape
Circulation
Plant



From: Craig Hatton [REDACTED]
Sent: 03 May 2024 14:41
To: SADPD
Subject: Network Rail response to Lambeth SADPD Reg 19
Attachments: Network Rail response to Lambeth SADPD Reg 19.pdf

Follow Up Flag: Follow up
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Categories: Green category, Yellow category

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OFFICIAL

Good afternoon,

Please find attached Network Rail's representations to the Regulation 19 consultation

Please could you confirm receipt of these by reply

Best,
Craig



Craig Hatton MA MRTPI

Senior Town Planner

Network Rail Property (Southern)

Office Address: 1 Puddle Dock, London, EC4V 3DS

E: [REDACTED]

M: [REDACTED]

For Town Planning advice, please complete this [Instruction Form](#) and submit to TownPlanningSouthern@networkrail.co.uk, following which your project will be assigned to a Town Planner who will be in contact.

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Network Rail Infrastructure Limited,
 Waterloo General Offices,
 London,
 SE1 8SW
 E: [REDACTED]

Via email: sadpd@lambeth.gov.uk

3 May 2024

Dear Sir/Madam,

NETWORK RAIL RESPONSE TO LAMBETH SITE ALLOCATION DEVELOPMENT PLAN DOCUMENT (REGULATION 19)

Thank you for providing Network Rail with the opportunity to make comment on the pre-submission version (Regulation 19) of the Site Allocation Development Plan Document (SADPD). It is important that the sites within the SADPD reflect the aspirations of Network Rail and the wider rail industry as far as possible, and that the Plan provides suitable flexibility to support future growth of the railway for both passenger and freight services. The railway network is a vital element of the country's economy and a key component in the drive to deliver the Government's sustainable agenda.

In addition, Network Rail is a statutory undertaker responsible for maintaining, operating and developing the main railway network and its associated estate. Our aim is to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will also need to be carefully considered.

Network Rail is a statutory consultee for any planning applications proposing development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. It is important that site allocations within the Development Plan acknowledge the need for the impact of new development to be assessed and mitigated, both on an individual site by site basis, as well as the cumulative impact of multiple site allocations and/or windfall sites brought forward in the plan period.

Site 3: 35–37 and Car Park Leigham Court Road SW16

Network Rail supports the allocation of this site and the opportunity to maximise density should be taken due to its location in relation to Streatham Hill station and PTAL level of 6a. Furthermore, Network Rail believe this is consistent with National Policy including the prioritisation of brownfield urban sites in the delivery of a sufficient supply of homes. Network Rail would highlight that 25-30 units for this 0.22ha site in highly connected area

could be seen as unambitious. Considering Policy D2 of the London Plan and the sites PTAL level, it could be argued that these types of sites need to be maximised to a reasonable extent. Network Rail appreciates this must be balanced with the existing environment and characteristics of the area.

Network Rail would be open to engaging with the council about integrating or enhancing the neighbouring SINC within Network Rail's land ownership with regard to the latest Biodiversity Net Gain planning requirements.

Site 22: 1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24

Network Rail supports the draft allocation as it identifies the opportunity for securing improvements at Loughborough Junction railway station.

Loughborough Junction is a key priority station for improvements and has very poor accessibility with no step free access, no impaired mobility set down/pick-up point or accessible toilets. Therefore, Network Rail proposes that the following wording be included in the draft site allocation:

Loughborough Junction station is a key priority for access improvements as the station currently has no step free access. Making the station step free will allow for all users to be able to access the station and be of significant local benefit. Contributions towards making the station step free will be sought from the development proposed within the site allocation as a key infrastructure requirement.

Network Rail would also like to take this opportunity to highlight necessary engagement with the Asset Protection Team (ASPRO) given the proximity of the proposed site allocation to the railway along the northern boundary. Reference should be made to this within the draft site allocation and the following wording is proposed.

Given the proximity of the proposed development within the allocation to railway infrastructure, it will be necessary to engage with Network Rail's Asset Protection Team, to ensure no impacts on the safe and efficient running of the railway and ensure access to the railway for repairs and maintenance is not prohibited.

Additionally, Network Rail believe this draft site allocation could go further with regards to the density of housing proposed. Considering the site's location and the type of neighbouring land use, there is an opportunity to increase the density of housing on this site by more than the draft site allocation recommends.

Site 23: Land at corner of Coldharbour Lane and Herne Hill Road SE24

Network Rail supports the draft allocation as it identifies the opportunity for securing improvements at Loughborough Junction railway station.

Loughborough Junction is a key priority station for improvements and has very poor accessibility with no step free access, no impaired mobility set down/pick-up point or accessible toilets. Therefore, Network Rail proposes that the following wording be included in the draft site allocation:

Loughborough Junction station is a key priority for access improvements as the station currently has no step free access. Making the station step free will allow for all users to be able to access the station and be of significant local benefit. Contributions towards making the station step free will be sought from the development proposed within the site allocation as a key infrastructure requirement.

Network Rail is supportive of the reference to ensuring community safety and facilitating Network Rail infrastructure. Given the draft allocation's proximity to the railway, additional wording should be provided within the Policy which sets out the need to consult with Network Rail's Asset Protection Team (ASPRO) as follows:

Given the proximity of the proposed development within the allocation to railway infrastructure, it will be necessary to engage with Network Rail's Asset Protection Team, to ensure no impacts on the safe and efficient running of the railway and ensure access to the railway for repairs and maintenance is not prohibited.

Similar to other allocations, Network Rail believes this allocation could go further in maximising the opportunity to develop a brownfield site in a sustainable location, in line with the NPPF, by permitting a higher density of housing units on the site.

Site 24: King's College Hospital, Denmark Hill SE5

Network Rail would encourage reference within the draft site allocation to focus on improving pedestrian and cycle links to Denmark Hill station. Investment or design led improvements would reduce car-reliance and congestion in the area and encourage people to use the rail network through enhanced access. Explicit reference to improving links to Denmark Hill station should be included within the Transport, Movement and Public Realm as part of improving pedestrian and cyclist links.

Network Rail would also like to take this opportunity to highlight necessary engagement with the relevant Asset Protection team regarding the railway line bounding the site to the south. Reference should be made to this within the draft site allocation and the following wording is proposed.

Given the proximity of the proposed development within the allocation to railway infrastructure, it will be necessary to engage with Network Rail's Asset Protection Team, to ensure no impacts on the safe and efficient running of the railway and ensure access to the railway for repairs and maintenance is not prohibited.

Network Rail reserve the right to make any further comments and attend the Examination in Public as necessary. Please could I be kept up to date with the progress of the SADPD as it moves through the process.

Kind regards,

Craig Hatton MRTPI
Senior Town Planner

From: James Huish [REDACTED]
Sent: 03 May 2024 12:11
To: SADPD
Cc: [REDACTED]
Subject: Lambeth Site Allocations DPD PSV - Representations (HSBC Bank Pension Trust UK Ltd)
Attachments: 240503 Montagu Evans Representation - Lambeth SADPD Reg 19 vF.pdf; m84_tesco_stores_ltd_3214.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Green category

You don't often get email from [REDACTED] - [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir / Madam

Please find attached our letter of representation on the Site Allocations DPD PSV, on behalf of our client HSBC Bank Pension Trust UK Ltd.

Our representations comprise the attached letter plus two enclosures. The first can be downloaded here (<https://we.tl/t-RGG0xrXDDb>) and the second is attached. They relate specifically to Proposed Site 20 on Acre Lane.

Please confirm receipt of the documentation, including successful download of the design document. Should you have any issues, please do let us know.

Likewise, if you would like to discuss anything raised in the letter, please do contact us. We are keen to maintain discussion on the principle and details of redevelopment of this Site such that it can contribute positively towards the delivery of Lambeth's objectives over the plan period.

Kind regards

James
JAMES HUISH
ASSOCIATE

Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE

d: [REDACTED] m: [REDACTED] e: [REDACTED]

**"THE CHALLENGE WE FACE IS TO CREATE THOUGHTFUL
DESIGNED, AFFORDABLE AND SUSTAINABLE LIVING
SPACES, IN EVER-INCREASING NUMBERS, THAT OFFER
SOMETHING MORE FOR THOSE WHO OCCUPY THEM"**

PD13946/GB/AB

email: [REDACTED]

3 May 2024

Lambeth Council
Planning Policy and Strategy
PO Box 734
Winchester
SO23 5DGBy email only to: sadpd@lambeth.gov.uk

Dear Sir/ Madam,

**TESCO SUPERSTORE, 13 ACRE LANE, BRIXTON, LONDON SW2 5RS
REPRESENTATIONS TO THE REGULATION 19 CONSULTATION ON THE LAMBETH DRAFT SITE ALLOCATIONS
DEVELOPMENT PLAN DOCUMENT (DRAFT SADPD)****Context For Representations**

We are instructed by our client, HSBC Bank Pension Trust (UK) Ltd, to formally submit representations to the London Borough of Lambeth ('LBL') consultation on the Draft Site Allocations Development Plan Document (SADPD) (Regulation 19) in relation to the Tesco Superstore at 13 Acre Lane, Brixton, London, SW2 5RS ('the Site').

Our client has a freehold interest in the Site in accordance with a 999 year lease from 2008. Tesco currently occupies the Site with a lease that expires in 2028. The Site continues to be subject to a draft site allocation within the draft SADPD, identified as 'Proposed Site 20'.

Montagu Evans provided a response to the Regulation 18 consultation in February 2022 and met with the LBL planning policy team in June 2023 to discuss the principle of development on the Site. We do not intend to repeat the previous representations here, but do restate points where these are still relevant. Therefore, this letter should be read in conjunction with the Regulation 18 consultation response.

The Site and Surroundings

We briefly summarise the key context for the Site, which is set out at p74/75 of the Draft SADPD. We note that there has been no material change to the site context, nor planning policy, since our last representations in early 2022.

The Site extends to 1.25ha, comprising a single storey Tesco supermarket with 2,500 sq m NIA and 239 surface level car parking spaces. It is within Brixton town centre and the Brixton Creative Enterprise Zone. There are no heritage assets on site, although it is close to other assets including conservation areas and listed buildings. The Site benefits from an excellent PTAL and Flood Risk Zone 1.

The existing building is considered to be harmful to the urban design of the area. It comprises poor architecture which has no relationship to its context in terms of detailing and materials. It also presents no active frontage to the street scene along Acre Lane.

There is no relevant planning history available for the Site.

Priorities & Objectives

As noted previously, our client is broadly supportive of the aspirations of the draft allocation 'Proposed Site 20' within the SADPD and are confident that there are no impediments to bringing the Site forward for redevelopment. However, their primary objective is to ensure that the Site remains fit-for-purpose in the short, medium and long-term and can continue to contribute positively to Brixton's distinctiveness. In doing so, there will be an opportunity for the Site to deliver significant long-term, local community benefits to Lambeth.

Given the Site's highly accessible, sustainable, urban location, we reiterate that there is significant potential to strengthen the Town Centre environment with the provision of a new, high quality designed development that would provide new market and affordable homes, a replacement supermarket, ground floor active frontage and the enhancement of pedestrian connectivity through and around the Site through the creation of new routes.

Our client supports the reprovision of a supermarket on the Site as part of the draft allocation and are committed to working with Tesco to ensure the delivery of this, which will have some logistical challenges during the construction phases.

Our client will continue to work proactively with Tesco in order to ensure that any future development proposals on the site are carefully considered, fit-for-purpose, make a significant enhancement to developing the economic resilience of Brixton Town Centre and deliver a social and environmentally sustainable development.

However, delivery of the Site is subject to the viability and feasibility associated with impacting the existing business and a key consideration of development, in the short term is ensuring continuity of trade.

Amendments to Proposed Site 20 – Regulation 19

We recognise that the Reg 19 version of the Draft Site Allocation has been updated to:

- Increase the quantum of residential development from 120-170 units to 180-210 units;
- Amend the transport policy, noting a material reduction in levels of car parking (and the requirement for evidence based justification to any parking provided above London Plan standards); and
- Refer to heritage impact to reflect the NPPF requirements.

Since the Regulation 18 stage, both LBL and our Client has undertaken further work on an indicative approach to development of the site, taking a design-led approach.

Therefore, the focus of these representations is on the quantum of development as set out below.

LBL Design Evidence

We recognise that LBL has produced the following supporting documents for the Regulation 19 stage:

- Site 20 Design Evidence (September 2023) (including Townscape and Visual Impact Assessment);
- Viability Assessment (June 2023) (for all sites); and
- Daylight Amenity Assessment (February 2024) (for all sites).

We note that LBL's indicative approach has been designed to ensure that no harm is caused to the setting of nearby heritage assets and no harm is caused to local views. We appreciate the Design Evidence recognises that *"this does not preclude other possible approaches to optimisation coming forward, in different forms, through the planning process"* (para 5.5). Therefore, it is our view that additional massing and development form could be delivered on the Site and continue to provide an acceptable scheme.

S&P Design Evidence and Quantum of Development

The client team met with LBL officers in June 2023 and presented an indicative design, prepared by Squire and Partners (S&P) architects, which would deliver the reprovision of a standalone supermarket and development of approximately 324 dwellings in seven blocks above podium and basement car parking. This was supported by townscape and daylight/sunlight advice, but included taller buildings, including an 18 storey block.

That scheme was, in part, led by the logistics around phasing and ensuring the continuity of a supermarket on the Site whilst the wider development is being delivered, as well as design, viability and impact on townscape.

We have since received confirmation from Tesco that it would be acceptable for dwellings to be placed above the new supermarket. Therefore, S&P have proposed a revised approach to the indicative design (see **Enclosure 1**).

S&P has produced a revised indicative design that would deliver a total of **306 homes**, in buildings ranging from 6 to 12 storeys. The blocks would be well-within the tall building limit and demonstrates how approximately 300 units (with a mix of unit sizes) could be delivered in blocks of more appropriate height and massing to the context.

Townscape – Comparison of LBL Design Evidence and S&P versions

Firstly, we assess the design evidence produced by LBL before comparing it to S&P's proposals, which we deem to be an improvement.

The LBL Design Evidence introduces redevelopment of the site into three building blocks:

- The main building block would have a footprint similar to the existing Tesco store, occupying the corner of Baytree Road and Acre Lane. The re-provided retail store would be above a car park, in a semi basement, that would front onto Acre Lane. The building would step up to nine storeys with the tallest part opposite Bucknell Close.
- A smaller block of up to seven storeys would be located on Acre Lane with a rear wing extending into the site, running parallel to the terraces on Porden Road.
- A third block of four storeys would terminate the terrace at the corner of Acre Lane and Porden Road.

In our view, the LBL Design Evidence presents a street frontage along Acre Lane that would be a monolithic volume, stepping up to nine storeys. The servicing arrangement and customer vehicular access off Acre Lane would separate the two building blocks on Acre Lane, creating a canyon-like gap in the street frontage. The central block next to the service road is set back from the building line of Acre Lane which disrupts the street frontage further, introducing an unsatisfactory space that is likely to be overshadowed for most of the day, providing limited quality. The large footprint of the retail store and orthogonal layout would appear at odds with the rear gardens of the properties on Baytree Road, while the arrangement of the smaller block would create a courtyard overlooking the servicing area with little amenity value.

Overall, the LBL Design Evidence does little to engage with the surrounding context and does not deliver a scheme that is contextual or engages with the adjoining townscape.

We propose an alternative approach, which we deem to be an improvement. The S&P version would introduce a series of linear blocks along Acre Lane. These blocks would break up the street frontage and mirror the historic appearance of Acre Lane with individual villas in large gardens. Stepping up to Ground Floor plus 12 storeys at the centre of the site, the buildings would create a visually interesting roofline without interfering with the views along Acre Lane from the north and south. The buildings along the western site boundary would be positioned in such a way that they minimise visual impact, creating a successful interface with the existing properties. A smaller block at the end of the terrace on Porden Road would terminate this row of buildings, achieving an overall varied composition that fits into the street frontage of Acre Lane. Public green spaces and communal gardens on top of the retail store would provide meaningful amenity space and greenery, thereby contributing to biodiversity. The pocket gardens and roof gardens would tie in with the green character of Acre Lane, ensuring the scheme fits into the local townscape. A small-scale volume at the corner of Acre Lane and Baytree Road would help integrate the scheme into the two-storey context to the south and west.

A comprehensive visual impact assessment will demonstrate that the scheme would not interfere with any of the views identified by the London Views Management Framework (LVMF). However, two local views run across the site:

- Q25 (c) (i) Views NNW from Brockwell Park to (a) Lambeth Town Hall's Tower, and (b) St Matthew's Church tower.
- Q25 (c) (ii) Views from Norwood Park to the City

The S&P proposals are unlikely to be markedly different in those views compared to the Design Evidence version.

Heritage – Comparison of Design Evidence and S&P versions

There are a number of designated and non-designated heritage assets whose setting would be affected by the redevelopment of the Site, including:

- Brixton Conservation Area (BCA);
- Trinity Gardens Conservation Area (TGCA);
- Rush Common & Brixton Hill Conservation Area (RCCA);
- Church of St Matthew (Grade II*), Mausoleum of Richard Budd within the churchyard (Grade II*) and gate piers (Grade II);
- Lambeth Town Hall (Grade II);
- 46 Acre Lane (Grade II);
- 48-50 Acre Lane (Grade II);
- 52 Acre Lane (Grade II);
- 55-57 Acre Lane (Grade II);
- Trinity Homes Alms-houses, 1-26 Acre Lane (Grade II);
- 88-92 Acre Lane (Grade II);

- 55-57 Acre Lane (Grade II);
- Ivor House (locally listed); and
- 'Electric Brixton', Town Hall Parade (locally listed).

A key consideration will be the impact on the setting of Lambeth Town Hall – and particularly views of the Town Hall tower – and the setting impacts on the Grade II listed houses opposite and the BCA and TGCA. Our initial assessment concludes that there would be no harm to the heritage assets in the study area.

Trinity Gardens Conservation Area ('TGCA'), including Trinity Homes Alms-houses

Located immediately to the north of the site, the TGCA comprises the alms-houses that form the Trinity Homes complex and the Grade II listed early Victorian villas fronting onto Acre Lane. The S&P version would introduce a varied streetscape composed of a row of residential blocks mirroring the original layout of Acre Lane with free detached villas surrounded by gardens. Acre Lane would regain its verdant character and have an activated street frontage with residential entrances, similar to the traditional streetscape within the CA. Stepping up to greater heights at the centre of the site, the S&P version would be 'book-ended' to the east and west by low blocks that respond to the adjoining context. As a result, the S&P version would preserve the setting of the conservation area.

Brixton Conservation Area ('BCA')

The BCA comprises the buildings along Brixton Road which form the town centre, including the listed town hall and St Matthew's Church and the locally listed Ivor House which abuts the site. The S&P version would repair the current situation which has led to a fragmented setting of the BCA and reintroduce a consistent street frontage, reinforcing the traditional character of Acre Lane. The proposed approach would enhance the setting of the BCA.

Church of St Matthew

Separated from the site by the buildings on Brixton Hill, including the town hall and Civic Centre, there would be limited intervisibility between the church and the scheme from within the churchyard. The scheme would cause no harm to the setting of the church.

Lambeth Town Hall

The S&P version would introduce residential blocks that mirror the traditional arrangement of villas along Acre Lane. This composition would be deferential to the Town Hall tower in the views from the corner of Brixton Road and Coldharbour Lane. As a result, the significance (including setting) of the listed building would be preserved.

Listed buildings on Acre Lane

The street frontage of Acre Lane opposite the site comprise several Grade II listed buildings. The current condition of the site detracts from the quality of the buildings. By introducing residential blocks set in greenery, the S&P version would reinforce the traditional character of Acre Lane. The proposed heights are not considered problematic given the careful composition of the building blocks, stepping down towards the east and west. The significance (including setting) of the buildings would be preserved.

Summary on Quantum of Development

In summary, we consider that the indicative scheme, designed by S&P, demonstrates an improvement to the design-led approach to development on this Site compared to the LBL Design Evidence. The layout of development would have a similar effect - and in some cases be an improvement – to the townscape views and heritage setting. A taller scheme was presented to officers in June 2023, with the support of daylight and sunlight testing from GIA and we consider a scheme of this size would represent an acceptable scheme in terms of impact on amenity.

It is noted that LBL is able to demonstrate a 5 year housing land supply, with the latest *Lambeth Housing Development Pipeline Report 2021/22* noting a 5.09 year supply (with the 5% buffer) for the period 2022/23 to 2026/27. Although Lambeth has generally performed well against its annual housing target of 1,335, it only delivered 714 net additional homes in 2021/22. The housing trajectory anticipates that LBL will not be meeting the cumulative London Plan target until 2028/29, with unevenness on distribution over the next 10 years.

When considering London as a whole, it is delivering considerably less housing than that required by overall targets, meaning London is performing poorly against the Housing Delivery Test. The availability of homes has a significant effect on home ownership and the quality and affordability of homes.

Our client's site represents an opportunity to deliver new homes (including significant quantum of affordable housing) and we consider the current draft allocation does not realise the site's true potential in spatial and economic terms. . We believe that the site can deliver 100 more homes than currently envisaged on this previously developed, brownfield site in an urban centre with an excellent PTAL. Indeed, through a design-led approach, and following detailed design, the Site may be

capable of delivery more. However, at this stage, we consider a conservative approach would generate a **site capacity of at least 300 homes**, which should be reflected in policy.

Transport

Our Client is advised by Caneparo Associates on transport matters who have contributed to these representations.

The draft allocation has been amended to require “a material reduction in levels of car parking” associated with the reprovided supermarket, and notes that an evidence-based justification is required to justify any level of parking above the London Plan standards.

The current operator, Tesco, is a major and nationally significant retailer and any mixed-use redevelopment where Tesco will continue to operate can only work if the site’s retail use continues to be commercially viable. A retail store of the size at Acre Lane supports weekly / fortnightly main food shops. The volume of purchases made at a typical weekly / fortnightly shop often means that transporting goods on foot, cycle or by public transport is unfeasible.

A ‘material’ reduction in parking spaces as stated in the SADPD would directly impact trade and the nature of what a retailer can offer in this town centre location. To remove car parking altogether (other than for disabled persons) would render a retail store of an equivalent or similar size as unviable. The size of the store directly correlates with the type of shopping and associated amenities which can be offered to customers, many of whom are reliant upon a car with no feasible alternative to travel.

Tesco’s position has been previously set out in their representations to the London Plan from 2019, which specifically refers to the need for car parking within high PTAL areas (such as this location), where large supermarkets continue to operate and provide a valuable service to a local catchment. Of note is the importance of being able to use a car and park at stores to transport bulky and voluminous goods. The removal of car parking as part of a mixed-use redevelopment would render Tesco’s operation commercially unviable, which would also likely be the case for other supermarket operators.

With regards to planning policy, it is relevant to highlight London Plan Policy T6.3 (Retail Parking) which states that:

“The maximum parking standards set out in Table 10.5 should be applied to new retail development unless alternative standards have been implemented in a Development Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in Policy SD7 Town centres: development principles and Development Plan Documents.”

This makes it clear that alternative standards may exist in a Development Plan and that a town centre first approach should be followed, which in this case is the immediate context of Brixton town centre.

Furthermore, Policy T6.3 goes on to say that:

“Boroughs may consider amended standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in:

- 1) *A diversion of demand from town centres to out of town centres, undermining the town centres first approach.*
- 2) *A significant reduction in the viability of mixed-use redevelopment proposals in town centre.”*

The above reiterates the town centres first approach and provides for amended parking standards where the viability of a mixed-use development in a town centre could be significantly affected. The commercial viability of a similar sized Tesco store relies on having a proportionate number of parking spaces as evidenced in the attached Tesco representations to the draft London Plan in 2019. This is reiterated for this site on Acre Lane which shares comparable characteristics to the other central London Tesco stores.

It is apparent that if the car parking associated with Tesco is not re-provided at a level that would be commercially viable, it will impact the viability of the redevelopment of the site for additional housing. The Client would therefore request that the draft wording is amended to remove the word ‘material’.

The appropriate level of car parking would be assessed and fully justified through a planning application for redevelopment in the future. Depending on the

Proposed SADPD Amendments

Consequently, our client considers that amendments are required to the draft site allocation, which would secure the necessary flexibility for the detailed design of any future development proposals and support the optimisation of the

development capacity of the Site. These would help deliver key placemaking objectives and support the delivery of housing within the Borough.

The following table sets out the relevant policy extracts of the draft SADPD allocation 'Proposed Site 20' , which we have track changed. We submit our representations in a similar format to the Regulation 18 versions. The latest draft text is shown below, with our suggested wording amendments made by the strike through lines, with additions in red and comments given in square brackets where relevant.

We ask that the Council takes these detailed recommendations into account when moving the SADPD forward to the next stage.

[Continued at next page]

Proposed Site 20: Tesco, 13 Acre Lane, SW2 5RS		
	Draft Site Allocation Development Plan Document (Regulation 19) – Site Allocation Policy	Representation
Land Uses	Replacement supermarket with residential. The site has potential to accommodate approximately 180 to 210 self-contained residential units.	Replacement supermarket with residential. The site has potential to accommodate approximately 180 to 210 at least 300 self-contained residential units. [As per previous representations, we consider the Site has potential to accommodate significantly more development than the 180 to 210 units. This 'approximate' range limits the potential of this town centre site on brownfield land. We do not see any reason to limit the development to 210 units at this stage. In accordance with the NPPF, new development, including that on previously developed land, should seek to maximise the scale, form and density of the site given the town centre location. Feasibility work undertaken by our client indicates that the Site could accommodate at least 300 dwellings, as a conservative element, subject to detailed design].
Affordable Housing	The affordable housing threshold is 35 per cent	The affordable housing threshold is 35 per cent subject to viability
Building heights and views, townscape	The site is not appropriate for a tall development, defined as over 45m in this location. Development should address the following principles: <ul style="list-style-type: none"> reinstate a building line to Acre Lane introduce animation and pedestrian entrances to Acre Lane use materials and massing which responds positively to local distinctiveness ground floor residential units should all be provided with adequate defensible space, especially those fronting Acre Lane 	The site is not appropriate for a tall building development, defined as over 45m in this location. [...] [We believe the absence of the word 'building' is a typo here].
Transport, movement and public realm	Local Plan and London Plan transport policies will apply. These include, but are not limited to, London Plan Policy T5 relating to quantum and design of cycle parking, Policy T6 for maximum car parking standards, electric vehicle charging and Disabled Persons	Local Plan and London Plan parking standards will be apply flexibility to development proposals . All other Local Plan transport policies, plus Local Plan Policy Q1 on inclusive environments and Policy Q6 on urban design in the public realm should be addressed.

<p>Parking requirement, and Policy T7 regarding Deliveries, servicing and construction, and Local Plan Policies T3 and Q13 on cycle parking, cycle hire membership and design, Policy T6 on car club membership and permit free developments, and Policy T7 regarding servicing on site.</p> <p>In addition, Local Plan Policy Q1 on inclusive environments and Policy Q6 on urban design in the public realm should be addressed.</p> <p>A material reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. An applicant will need to provide an evidence-based justification to justify any level of parking over and above London Plan standards. Any car parking that is provided will need to focus on disabled persons parking and electric vehicle charging. Non-car access and pedestrian accessibility to the store should be positively promoted through scheme design.</p> <p>Visibility for pedestrians and cyclists should be optimised and pedestrian access into and through the site should be improved. This should include a widened footway along Acre Lane with enhanced urban greening.</p> <p>Servicing of the replacement supermarket should follow the existing retail servicing route i.e. be accessed from Acre Lane (exact location to be determined at application stage) with exit via Baytree Road. Vehicular cross-overs at Acre Lane should be minimised, to maximise pedestrian flow to and from the town centre.</p> <p>New streets should be legible, safe, and tree-lined, with adequate defensible space to ground floor residential uses.</p> <p>Landscaping should incorporate children and young people-friendly features such as play-on-the-way parallel playable routes.</p> <p>Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the local Healthy Route Network.</p>	<p>A material reduction in levels of car parking will be required, to achieve key Local Plan and Transport Strategy objectives around active travel, carbon reduction and air quality improvement. An applicant will need to provide an evidence-based justification to justify any level of parking over and above London Plan standards. Any car parking that is provided will need to focus on disabled persons parking and electric vehicle charging. Non-car access and pedestrian accessibility to the store should be positively promoted through scheme design.</p> <p>[As above, a material reduction in car parking for a supermarket would impact the viability of the redevelopment of the Site and make a supermarket commercially unviable. Such uses rely upon travel by car due to the bulky nature of goods being sold]</p>
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Summary

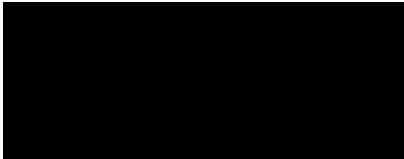
We welcome this opportunity to comment on the Lambeth Draft Site Allocations Development Plan Document (SADPD) (Regulation 19) as a key stakeholder within the area.

The Site's highly accessible, sustainable and urban location offers the potential to deliver a significant quantum of new private and affordable homes, a replacement supermarket that is fit-for-purpose, other appropriate town centre uses which would generate active frontages, and enhanced pedestrian connectivity through and around the Site. The amendments to the allocation within this Draft SADPD proposed are considered critical to the successful development of the Site and the continued economic growth and long-term sustainability of Brixton Town Centre.

We would be happy to continue discussions with the Council on these representations and the prospect of development of Proposed Site 20.

We would also be grateful if you could keep us informed with regard to the forthcoming Examination process and updates on the emerging planning policies. In the meantime, if you have any queries, please do not hesitate to contact me on [REDACTED] / [REDACTED] or my colleague James Huish on [REDACTED] / [REDACTED]

Yours faithfully,



Guy Bransby
Partner
Montagu Evans LLP

Enclosure 1 – Squire and Partners Design Document, April 2024

Enclosure 2 – Tesco Stores Limited, Hearing Statement for Examination of London Plan, 9 May 2019

Respondent: 3214



**Examination of the London Plan
Matter 84: Car Parking Standards
Tesco Stores Limited, Hearing Statement,
9 May 2019**

Matter: Car Parking : Non Residential Uses – Is the requirement for existing parking provision to be reduced to meet the maximum standards when sites are redeveloped justified (Policy T6I)?

INTRODUCTION

Tesco Stores Ltd (“Tesco”) can deliver approximately 10,000 new homes through the New London Plan period, through the intensification of land use via mixed-use redevelopments.

Tesco is a retailer. Mixed-use redevelopment of its sites will only come forward if a site’s retail use continues to be commercially viable.

Over time there are likely to be reductions in parking demand associated with large scale food retail sites, and a rise in online deliveries. Despite this, more than 80% of UK shoppers still carry out a weekly/ fortnightly main food shop. The volume of purchases made at a typical weekly / fortnightly shop often means that transporting goods on foot, cycle or by public transport is unfeasible. Therefore, whilst there remains a public desire to shop in this way, it will be necessary to provide appropriate levels of car parking for stores to remain viable.

Policy T6 Item I reads:

Where sites are redeveloped, existing parking provision should be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are developed outside of town centres in areas which are not well served by public transport, particularly in outer London.

The reference to flexibility is welcomed, however, the restrictions placed on this flexibility have the potential to stifle the redevelopment of town centre sites, which is the location most suited to high density redevelopment. To understand the usage of parking and the types of trip that take place at Tesco stores, case studies at 6 stores in locations with good public transport accessibility were undertaken.

The stores have PTAL scores of 5 or 6. The parking standard for these stores in the Draft New London Plan would be no car parking provision. If redevelopment were to come forward in these locations, the current policy wording would require any retained or replacement retail use on the site to have no car parking.

Full details of the data being relied upon in this note are in **Appendix A**. The stores examined are:

Name	GFA (sqft)	PTAL	Inner or Outer London	Parking Provision
Elmers End	26132	4 to 5	Outer	544
Enfield	26132	5	Outer	269
Hackney Morning Lane	23300	6a	Inner	254
Harrow	38456	5	Outer	357
Kennington Lane Vauxhall	23160	6b	Inner	202
Southwark	38147	5	Inner	241

For the 6 stores data sources were:

- Car parking occupancy during the busiest period (December) and at typical usage levels (September) was obtained from ANPR cameras at site access points.
- 2013 surveys on transport mode

- Clubcard data on purpose of visit related to spend
- February 2019 surveys on transport mode and purpose of visit.

CAR PARK OCCUPANCY

Looking at the ANPR data, the table below identifies the peak daily occupancy on the quietest and busiest days of December 2017 and September 2018.

Name	December 2017		September 2018	
	Quietest Day	Busiest Day	Quietest Day	Busiest Day
Elmers End	37.5%	112.5%	46.14%	84.56%
Enfield	56.88%	102.60%	66.17%	100.37%
Hackney Morning Lane	59.45%	90.94%	51.57%	84.65%
Harrow	56.02%	98.04%	59.10%	96.36%
Kennington Lane Vauxhall	21.78%	59.90%	27.23%	58.42%
Southwark	49.38%	95.44%	52.28%	78.84%

December shows the highest levels of occupancy in all cases. The quietest day occurs on 26th December; the busiest day varies but generally falls within the week before Christmas. All stores apart from Vauxhall experience occupancy levels above 90% pre- Christmas. Elmers End and Enfield, (both Outer London) have occupancy in excess of capacity meaning that vehicles were circulating the car park searching for spaces.

The September data shows the usage on the busiest days is lower than December at all stores. Outer London locations still see heavy car park use, with at least one occurrence of the Enfield car park at capacity. For the Inner London stores, peak occupancy levels are generally slightly lower.

In summary, irrespective of location in Inner or Outer London or PTAL score, significant numbers of customers are choosing to use their car to access stores.

CAR MODE SHARE

The 2013 surveys showed the following mode share:

Name	Car	Public Transport	Walk
Elmers End	91.09%	1.98%	6.93%
Enfield	64.71%	7.84%	24.51%
Hackney Morning Lane	22.94%	33.03%	41.28%
Harrow	70.91%	4.55%	23.64%
Kennington Lane Vauxhall	33.94%	4.59%	58.72%
Southwark	25%	12.5%	59.62%

Car usage was considerably higher for Outer London stores than in Inner London, with all Outer London stores exceeding 64% of visits by car compared to less than 35% of visits to Inner London stores. Public transport usage rarely exceeds 10%, with only the Hackney store having a substantial public transport mode share of 33% of trips. Walk is a more important mode for these stores, particularly in Inner London where it always exceeds the car mode share.

The 2019 surveys data shows:

Name	Car	Public Transport	Walk
Elmers End	72.57%	16.81%	10.62%
Enfield	60.47%	13.95%	25.58%
Hackney Morning Lane	36%	24.8%	36%
Harrow	67.83%	5.22%	26.09%
Kennington Lane Vauxhall	33.59%	19.85%	43.51%
Southwark	40.32%	26.61%	33.06%

This confirms that car remains the main mode of transport for the Outer London stores and that it is still important for the Inner London locations, being the main mode at Southwark and on a par with walking at Hackney. At Kennington Lane the car mode share remains the same at a third of trips, but public transport use has risen at the expense of walk trips.

PURPOSE OF VISIT

Tesco Clubcard data was analysed against the number of individual transactions and the amount spent for 2018. The data for each store is summarised below:

PURPOSE AS A PROPORTION OF TRANSACTIONS

Name	Main	2-3 Days	Dinner	Top up	Now
Elmers End	52%	12%	14%	19%	4%
Enfield	39%	17%	15%	25%	4%
Hackney Morning Lane	35%	16%	13%	31%	4%
Harrow	41%	19%	11%	26%	3%
Kennington Lane Vauxhall	35%	17%	14%	27%	7%
Southwark	33%	16%	14%	33%	5%

PURPOSE AS A PROPORTION OF FOOD SPEND

Name	Main	2-3 Days	Dinner	Top up	Now
Elmers End	81%	7%	6%	5%	1%
Enfield	70%	13%	9%	7%	1%
Hackney Morning Lane	62%	16%	8%	12%	2%
Harrow	71%	14%	6%	8%	1%
Kennington Lane Vauxhall	65%	15%	9%	9%	2%
Southwark	60%	16%	10%	13%	2%

At all stores, carrying out a main food shop formed the biggest reason for visiting the store, with between 36% - 56% of shoppers carrying out a main shop. Importantly, main food shopping consists of an even higher proportion of the amount of money that is spent in each store between 64% - 85% of the income from food.

The same data is also available for 2013 and is included in the data in **Appendix A**. It can be seen from this that there has been little change in the level of main food shopping taking place in the intervening period. This confirms that the rise in on-line ordering has not yet had a significant effect on peoples desire to carry out bulk food shopping in-store.

CAR USE RELATED TO JOURNEY PURPOSE

As well as identifying the purpose of visit to each store, the February 2019 surveys also asked shoppers to identify the mode of transport used to access the store. It is therefore possible to correlate the mode chosen with the purpose of visit. The following table shows the mode by trip purpose as an average across all stores:

Trip Purpose	Car	Public Transport	Walk
Main / large shop for the week	79.59%	10.88%	7.48%
Shop for the next 2 to 3 days	51.90%	21.52%	25.32%
Shopping just for something for dinner this evening	26.87%	22.39%	47.76%
Top-up food shop	42.34%	21.02%	35.44%
Food or drink to consume now (e.g. lunch)	51.35%	11.71%	34.23%

For main food shopping, car is the predominant mode of transport. It remains an important mode for other purposes, with only people shopping for dinner that evening not having the car as the highest mode share.

Focussing on main / large shops for the week at each store:

Store	Car	Public Transport	Walk
Elmers End	97.14%	0	2.86%
Enfield	75.00%	13.89%	11.11%
Hackney Morning Lane	70.83%	16.67%	12.50%
Harrow	88.89%	0%	11.11%
Kennington Lane Vauxhall	88.24%	5.88%	5.88%
Southwark	64.71%	29.41%	5.88%

As expected, car use is by far the main mode for main / weekly food shopping trips, even in Inner London locations. This demonstrates Tesco's concern that the removal of all car parking as part of the redevelopment of stores in high PTAL areas would render their operation commercially unviable.

SUMMARY

In summary, the case studies showed:

- Car parking occupancy levels at stores with PTALs 5/6 remains high with peak occupancy between 90% - 112.5% at the busiest time of year (December) and between 78% - 100% during normal trading times (September). Car mode share for Inner London stores is less than 35%, whilst for Outer London it ranges between 64% - 91%.
- A main food shop is the biggest reason for visiting all of the stores, forming between 36% - 56% of the store transactions. As a proportion of income generated from food sales in each store, the main food shop is even more important, forming between 64% - 85% of the food spend in each store.
- Car usage was the predominant mode for main food shopping trips at all stores.

CONCLUSION

The data confirms the intuitive conclusion that for main food shops the car is relied on heavily to transfer bulky goods. The availability of car parking is key to this type of shopping taking place. Main food shopping is the biggest reason for shoppers to visit supermarkets, even in high PTAL locations, and generally forms two-thirds or more of the food related income to these stores. The removal of main food shops would not just necessitate the same number of trips for two to three days or top-up transactions, it would require double the number of visits for these purposes because of the lower spend associated with these transactions. The removal of all car parking as part of mixed-use redevelopment of these stores would render their operation commercially unviable.

Over time, the demand for car use for main food shopping trips is likely to reduce as online deliveries increase. This change will not take place overnight and the demand for parking will continue for some time. Instant removal of all car parking at supermarket sites with PTALs 5 /6 will not result in wholesale mode shift, it will result in shoppers changing their shopping destination and potentially result in additional vehicle-km travelled by car, or fly parking adjacent to stores.

It is therefore requested that the wording of Policy T6 is amended and additional supporting text introduced as follows:

I. Where sites are redeveloped, existing provision should ordinarily be reduced to reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.

“There is the potential for large format retail sites to deliver housing (see H1B(2)(b)). However, it is recognised that this will only happen if housing can be delivered without adversely impacting the viability of the retained retail use in any redevelopment; which use can be heavily dependent on car parking availability. The starting point is therefore that parking on large format retail sites that are redeveloped should reflect the current approach and not be re-provided at previous levels unless the viability of any retained retail use is shown to be commercially unviable. In those circumstances the minimum parking provision required to make any retained retail use commercially viable can be made.”

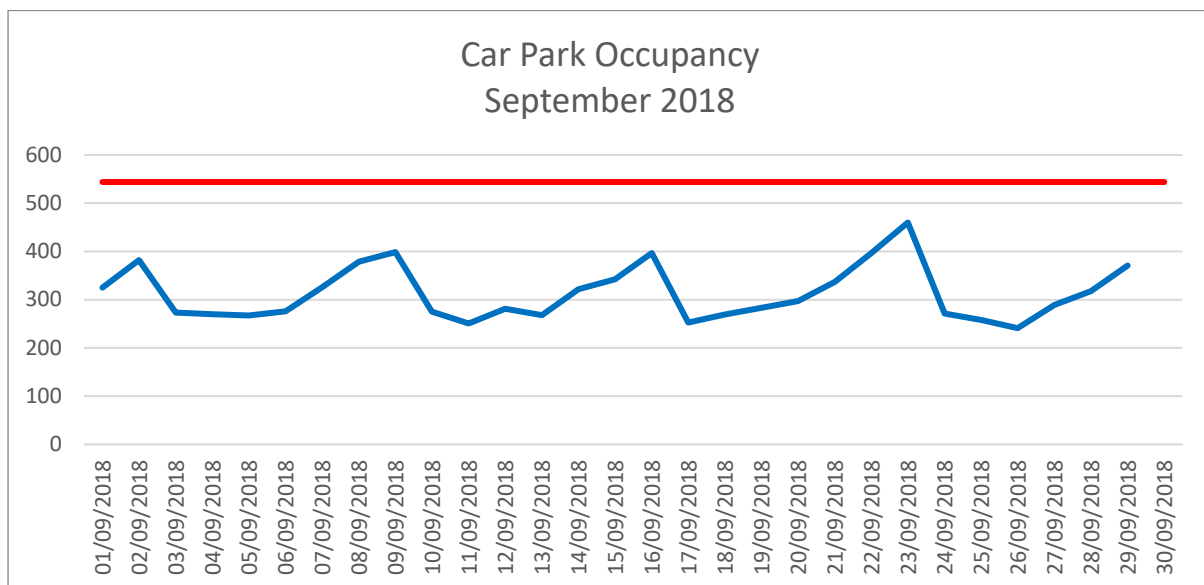
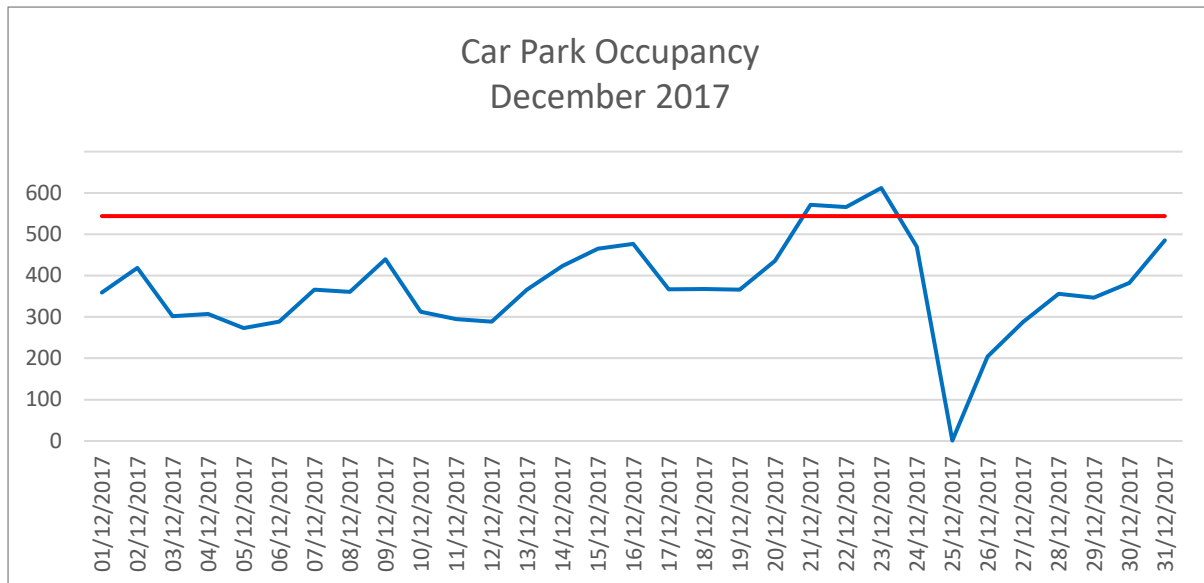
APPENDIX A

OUTER LONDON LOCATION

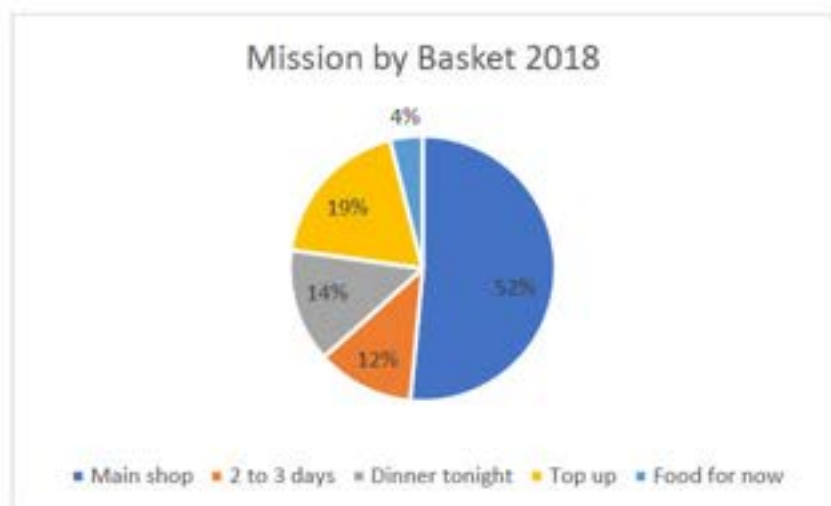
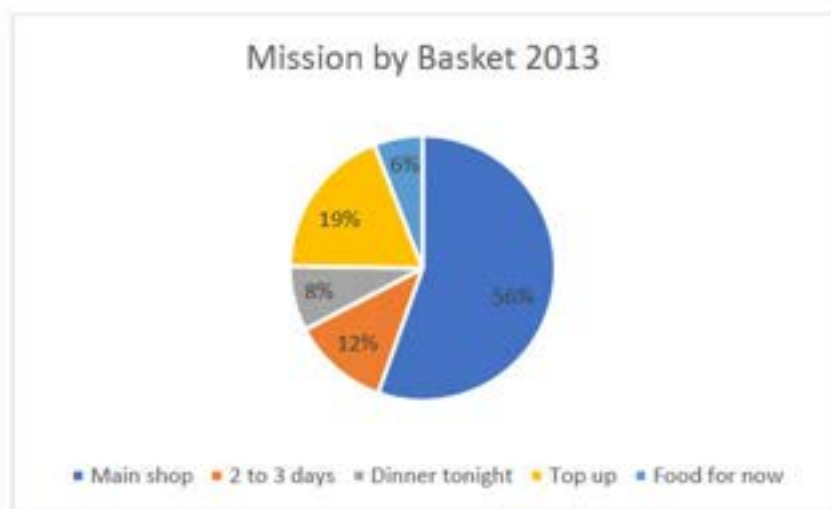
PTAL 4 / 5

544 Parking Spaces

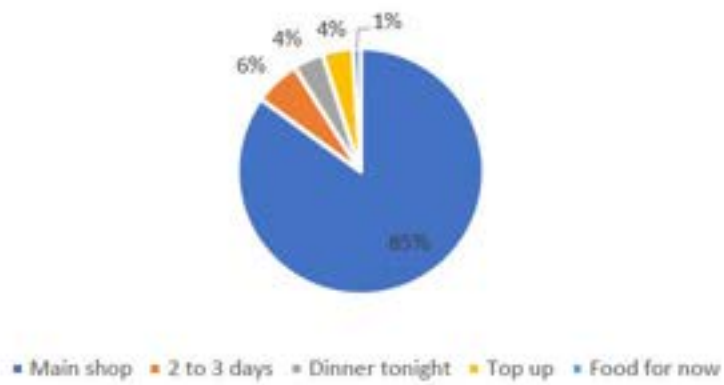
26132sqft



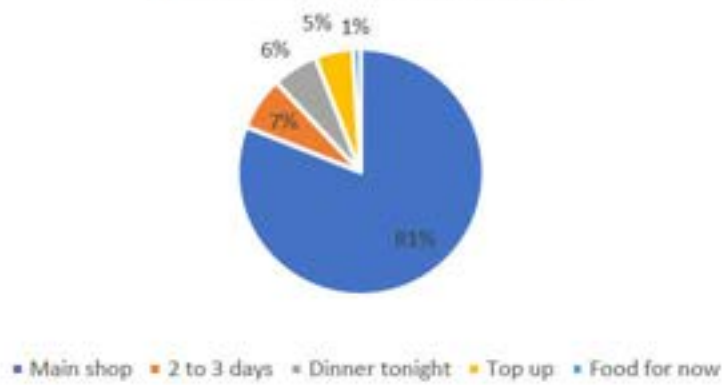
2013 QUESTIONNAIRE SURVEYS



Mission by Food Spend 2013



Mission by Food Spend 2018



OUTER LONDON LOCATION

PTAL 5

269 Parking Spaces

26132sqft

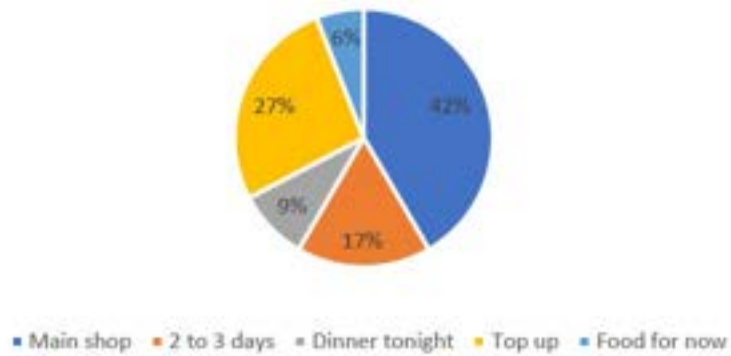


2013 QUESTIONNAIRE SURVEYS

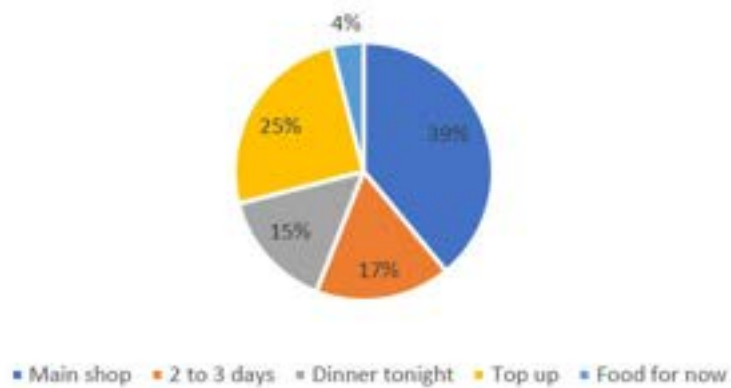
Mode Share



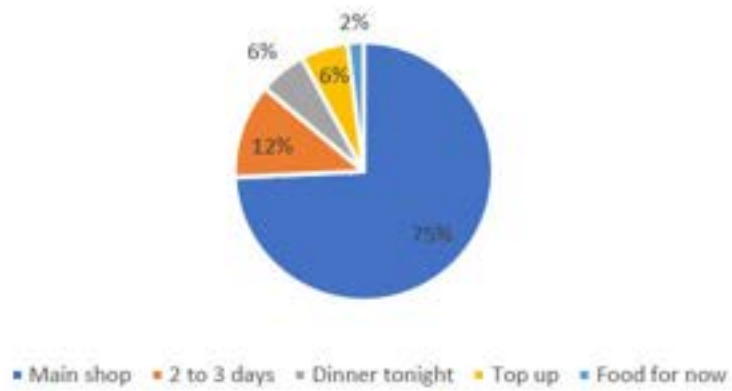
Mission by Basket 2013



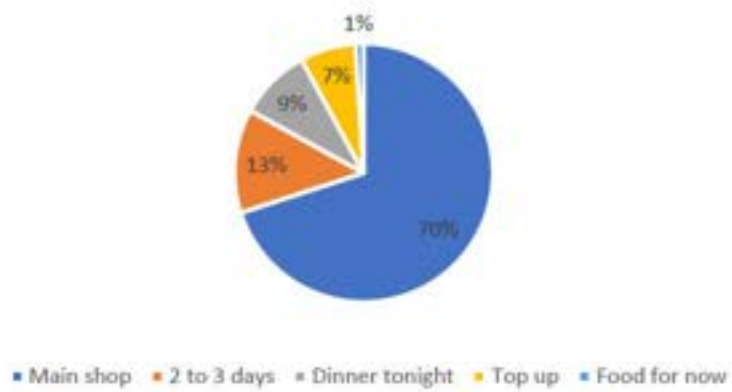
Mission by Basket 2018



Mission by Food Spend 2013



Mission by Food Spend 2018

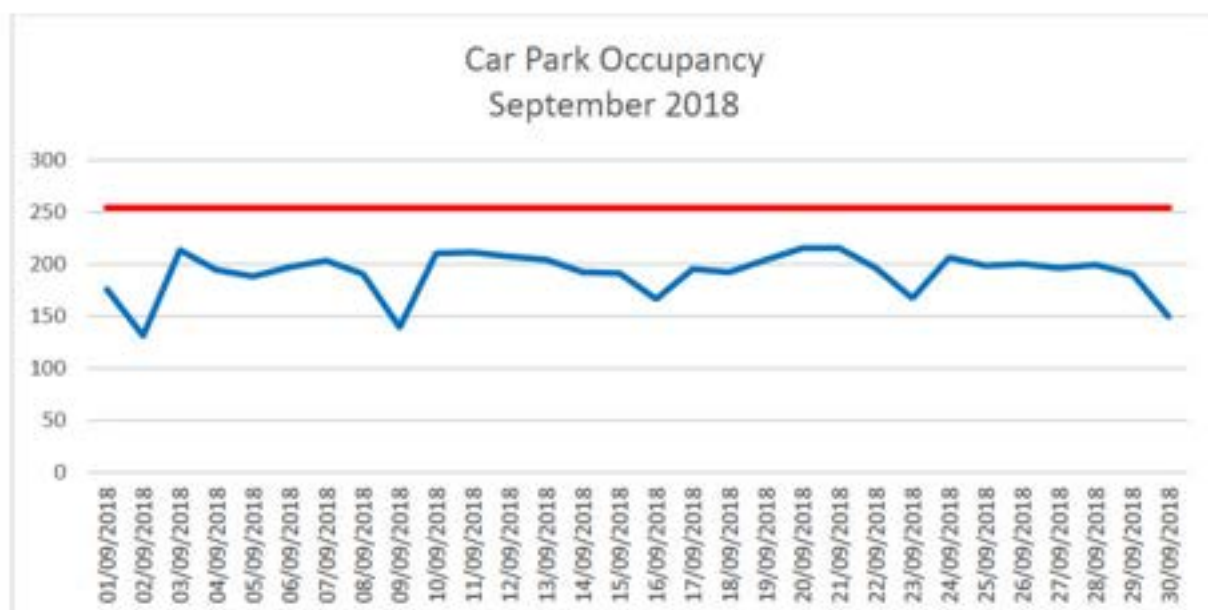


INNER LONDON LOCATION

PTAL 6a

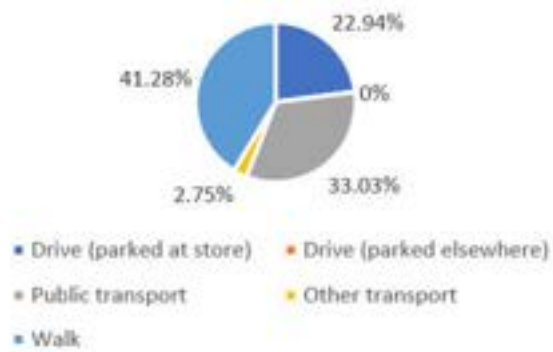
254 Parking Spaces

23300sqft

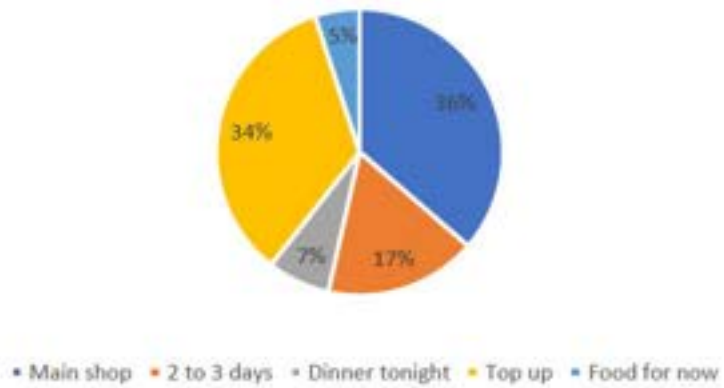


2013 QUESTIONNAIRE SURVEYS

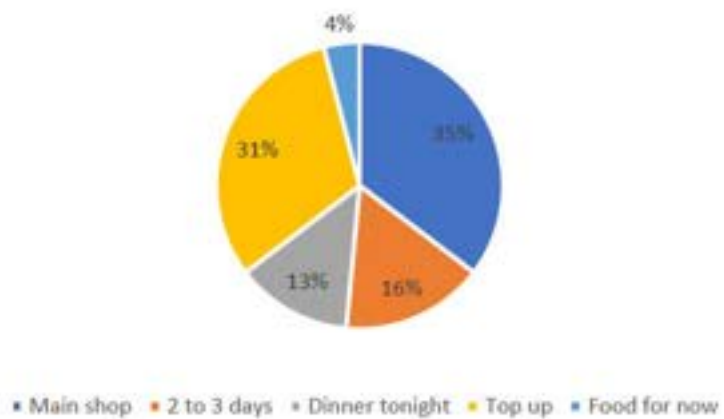
Mode Share



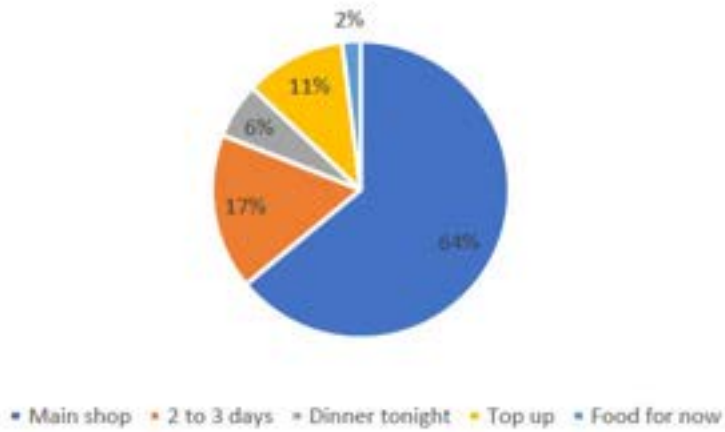
Mission by Basket 2013



Mission by Basket 2018



Mission by Food Spend 2013



Mission by Food Spend 2018



CASE STUDY - HARROW TESCO

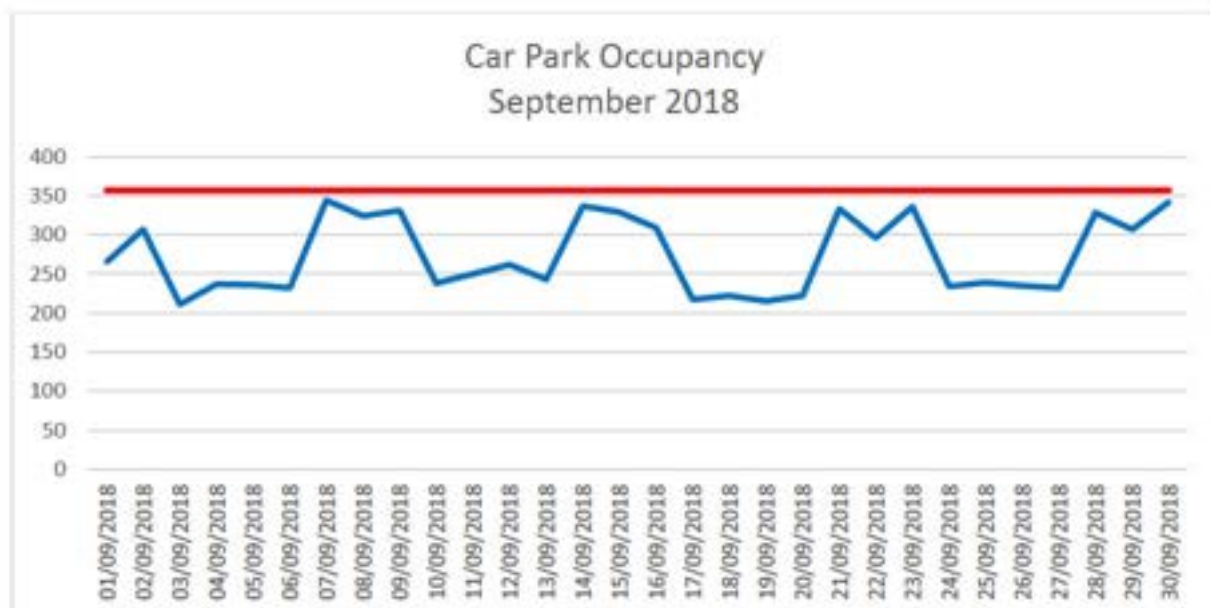
HA1 2TU

OUTER LONDON LOCATION

PTAL 5

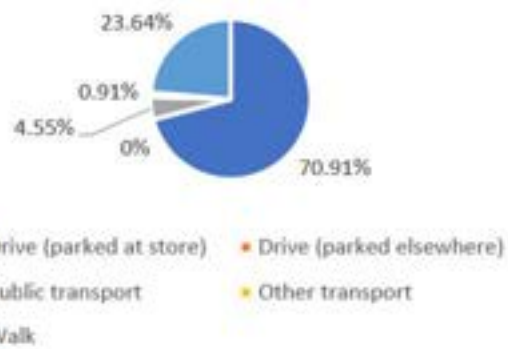
357 Parking Spaces

38456sqft

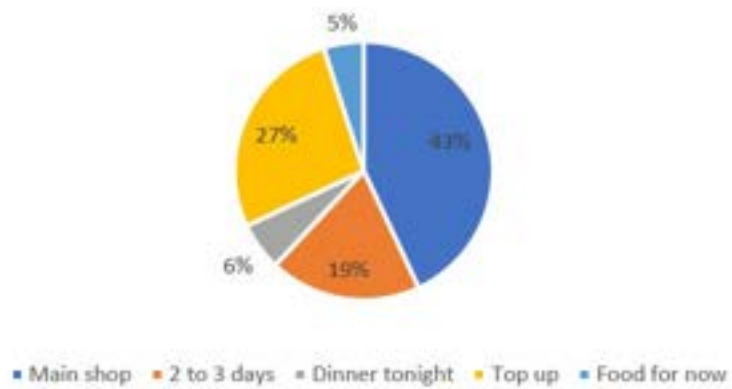


2013 QUESTIONNAIRE SURVEYS

Mode Share



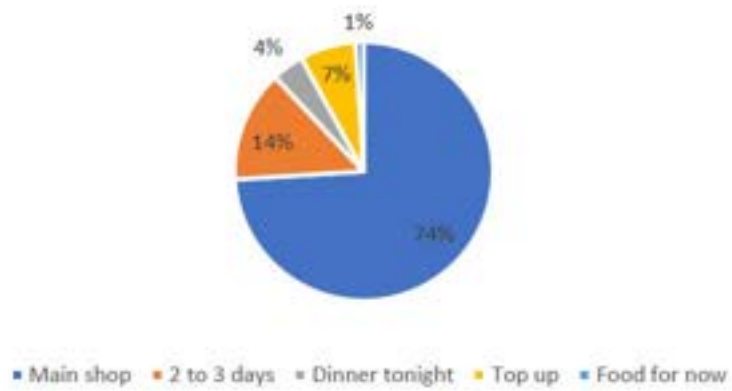
Mission by Basket 2013



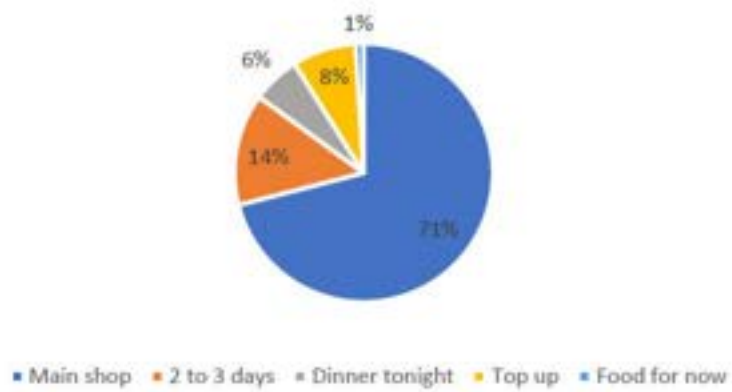
Mission by Basket 2018



Mission by Food Spend 2013



Mission by Food Spend 2018

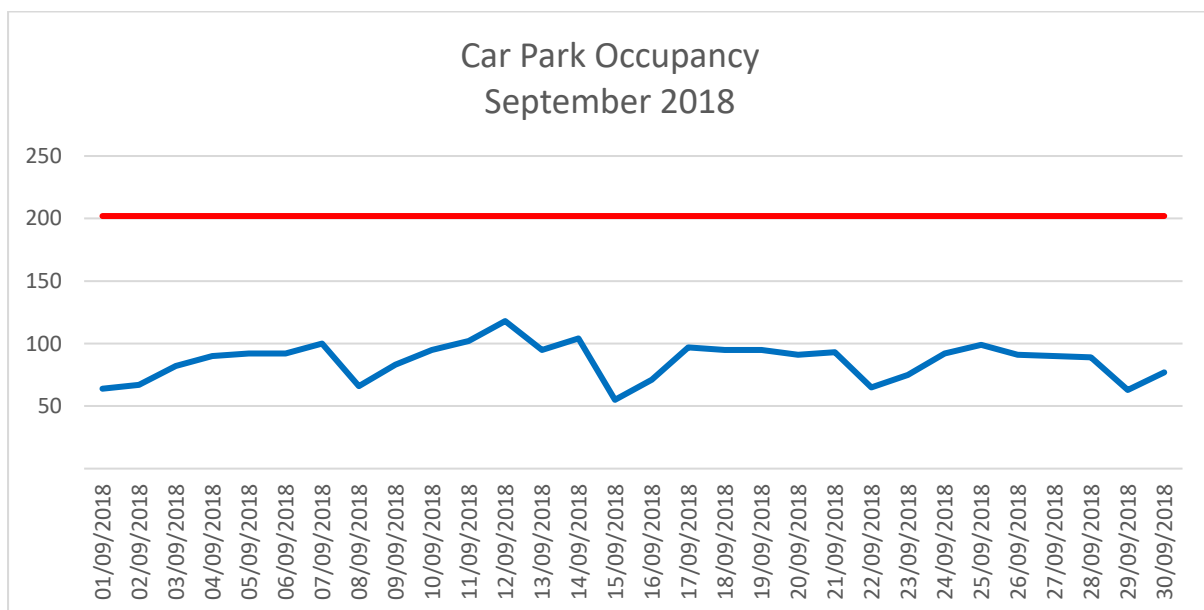
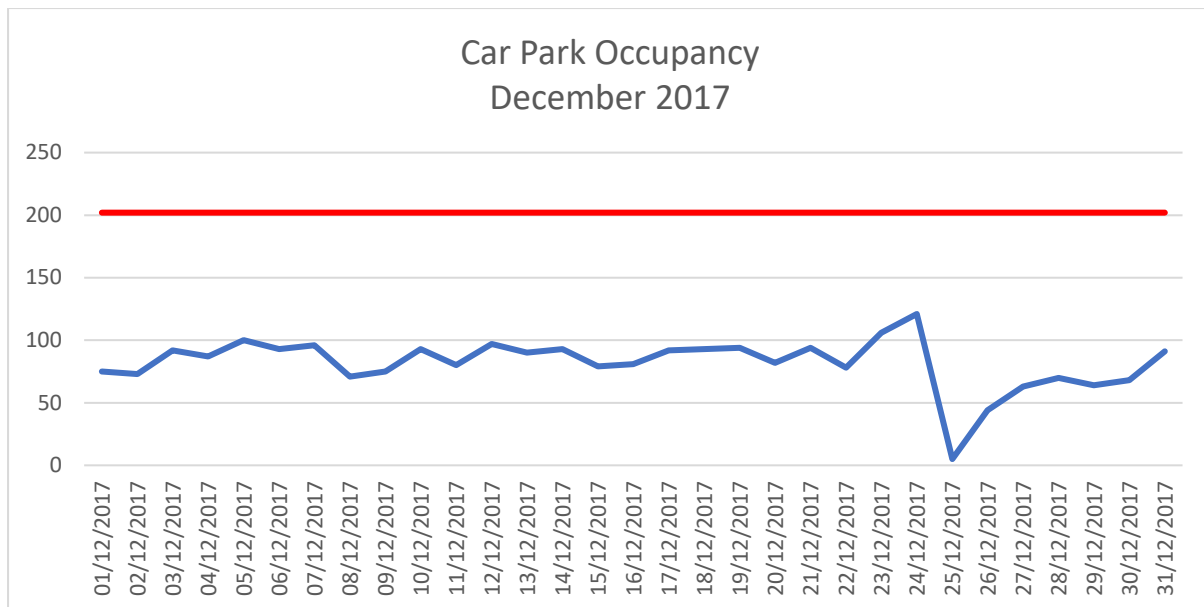


INNER LONDON LOCATION

PTAL 6b

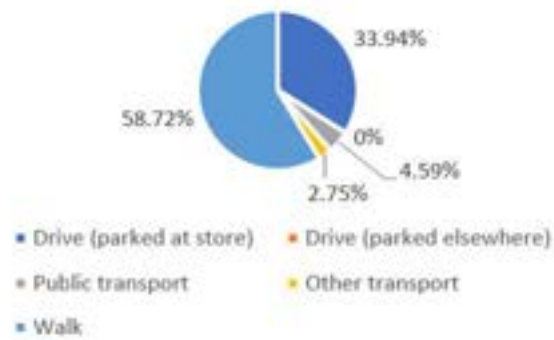
202 Parking Spaces

23160sqft

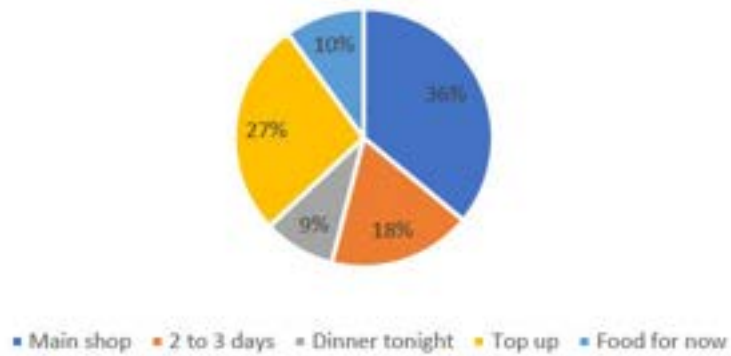


2013 QUESTIONNAIRE SURVEYS

Mode Share



Mission by Basket 2013



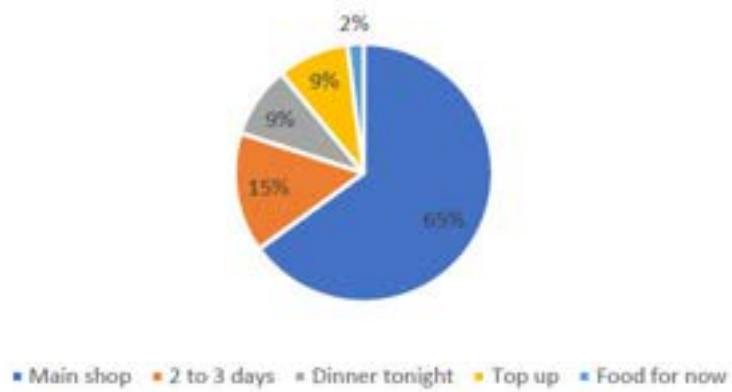
Mission by Basket 2018



Mission by Food Spend 2013



Mission by Food Spend 2018



CASE STUDY - SOUTHWARK TESCO

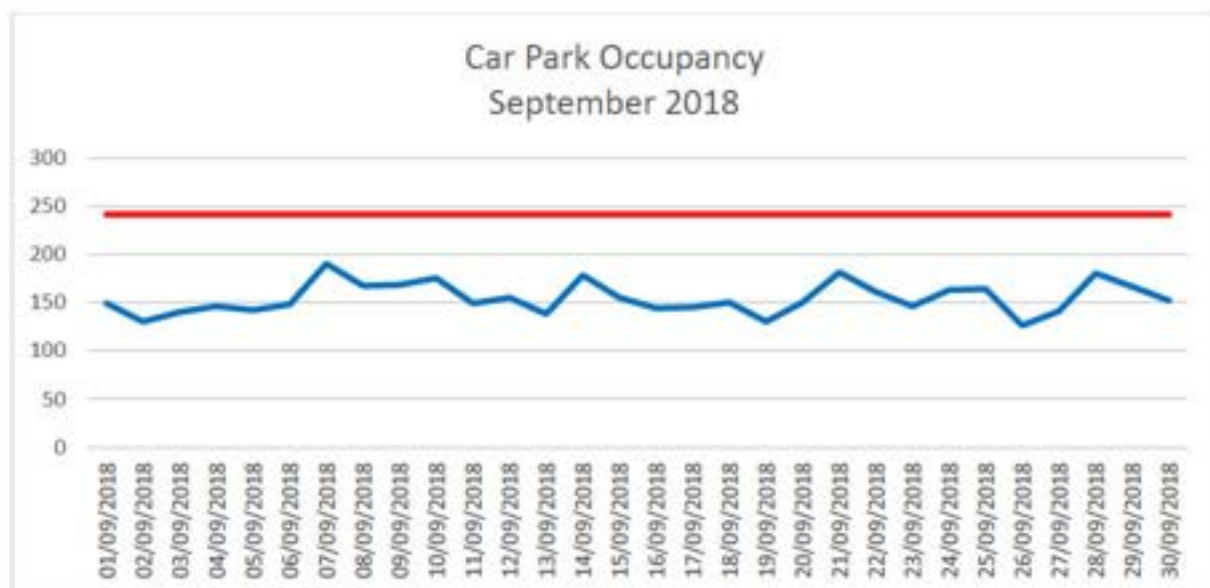
SE1 5HG

INNER LONDON LOCATION

PTAL 5

241 Parking Spaces

38147sqft

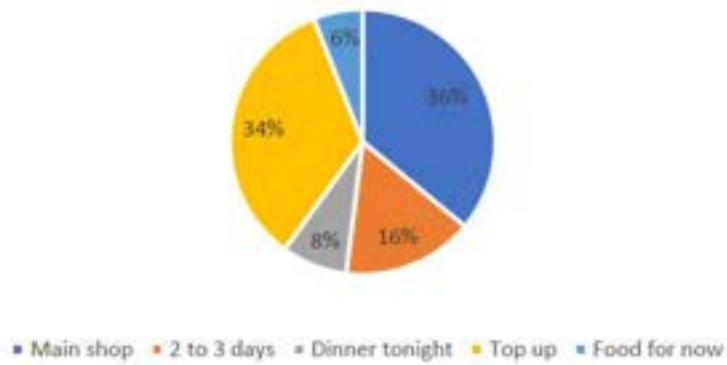


2013 QUESTIONNAIRE SURVEYS

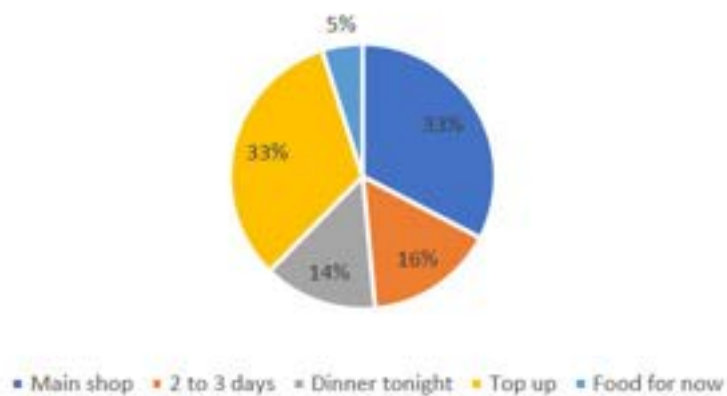
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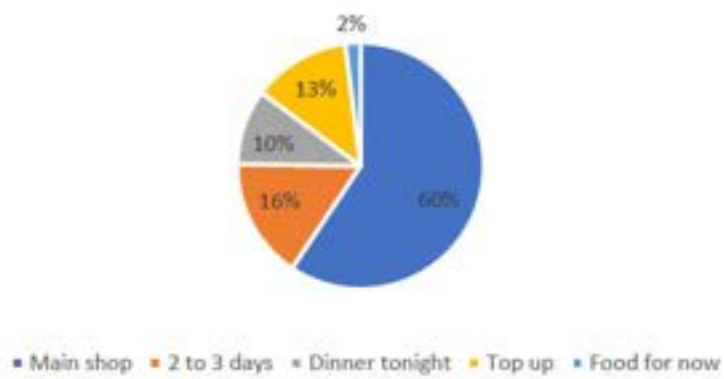
Mission by Basket 2018



Mission by Food Spend 2013



Mission by Food Spend 2018



From: Bunyan, Shea [REDACTED]
Sent: 03 May 2024 10:01
To: SADPD
Cc: KSLPlanning
Subject: Environment Agency comments on Proposed Submission Version of Site Allocation DPD
Attachments: SL101496(SB) - Lambeth Site Allocation DPD - Proposed Submission Version.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Green category, Purple category

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Good morning team,

Thank you for providing us with the further opportunity for us to provide comments on Lambeth's proposed submission version of the site allocation DPD.

Please find our comments attached to this email. We hope you find our response helpful.

If you have any queries or questions related to our response, please do not hesitate to be in touch.

Kind regards,

Shea Bunyan
Planning Advisor – South London Sustainable Places
Environment Agency | Seacole Building, 2 Marsham Street, London, SW1P 4DF

[REDACTED]
Mobile: [REDACTED]

Phonetic spelling: Sh-ay Bun-yun

Working days: Monday, Tuesday, Wednesday, Thursday

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Planning Policy
Phoenix House
(10) Wandsworth Road
London
SW8 2LL

Our ref: SL/2007/101496/SL-
04/SB1-L01
Your ref: SADPD PSV
Date: 3 May 2024

Dear Lambeth Council Planning Policy team,

Site Allocations Development Plan Document (proposed submission version)

Thank you for consulting us on the proposed submission version of your Site Allocations Development Plan Document (DPD), which we received on 8 March 2024.

We provided our response to your draft Site Allocations DPD on 22 February 2022 (ref. SL/2007/101496/SL-03/IS1-L01) and note that there are key areas where our advice has been considered appropriately and environmental concerns have been given due weight when determining site allocations within your borough, especially in relation to:

- flood risk;
- land contamination and protection of controlled waters;
- biodiversity;
- impacts on the River Thames and associated tidal flood defences.

We have reviewed the proposed submission version of the document and have the following comments or further advice to provide, in order to ensure the DPD contains the relevant site-specific information to encourage sustainable development within the London Borough of Lambeth.

Overarching comments

Lifetime of development for flood risk in planning

For Site Allocations 2 and 9, we note that the DPD states that developments must ensure that “the condition of tidal wall defences provide a sufficient level of defence in accordance with the design life of the building”. The text proceeds to refer to the assumed design life of these developments, in terms of flood risk, to be 100 years for a residential building, or 50-60 years for a commercial building.

In line with the updated national Planning Practice Guidance (PPG), the assumed lifetime of a development, in terms of flood risk, is at least 100 years for a residential development (as identified for both sites), and a starting point of at least 75 years for all non-residential developments ([Paragraph 006](#)).

We recommend that these sections are updated to reflect the updated national PPG by changing the wording from "50-60 years for commercial" to "75 years for non-residential".

Biodiversity net gain

We are encouraged to see the consistent reference to the requirement to deliver a minimum of 10% biodiversity net gain (BNG) for all sites. This is a requirement for all of the proposed site allocations highlighted within the DPD, as of April 2024.

We suggest the potential inclusion of the requirement for any site adjacent to a river to deliver 10% biodiversity net gain in the terrestrial setting, as well as 10% biodiversity net gain within the adjacent riverine environment.

Thames Estuary 2100 Plan

We are pleased to see the ongoing reference to and support of the Thames Estuary 2100 Plan on site allocations adjacent to the River Thames. It is important to ensure that all developments are designed with the plan in mind and are delivered with an appropriate reference to the aims and objectives of the plan.

Prioritising the use of the River Thames for transportation

We support the prioritisation of the use of the River Thames as a mode of the transportation of construction materials and waste during the construction, and of site waste once operational, on riverside adjacent allocated sites.

Site-specific comments

Site Allocation Proposal	Comments
Proposed Waterloo and South Bank Site Allocations	
Site 1: Royal Street, SE1	<p>Flood risk mitigation</p> <ul style="list-style-type: none"> • We recommend removal of reference to the 2005 modelled breach scenario for Canterbury House. • We welcome the restriction of only 'less vulnerable' uses at ground floor level and below. • We are encouraged to note the identification of 'more vulnerable' uses not being permitted below modelled breach flood levels. <ul style="list-style-type: none"> ○ We are pleased to note the further elaboration to specify the inappropriateness of self-contained residential uses and/or sleeping accommodation in basements at risk of flooding. <p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> • We are supportive of the acknowledgement of adjacent railway land as a potential source of contamination to groundwater.

<p>Site 2: St Thomas' Hospital, SE1</p>	<p>Flood risk mitigation</p> <ul style="list-style-type: none"> • We have recommended wording be amended from “50-60 years for commercial” to “75 years for non-residential” to align with the updated national PPG. • We welcome the restriction of only ‘less vulnerable’ uses at ground floor level and below. • We are encouraged to note the identification of ‘more vulnerable’ uses not being permitted below modelled breach flood levels. <ul style="list-style-type: none"> ○ We are pleased to note the further elaboration to specify the inappropriateness of self-contained residential uses and/or sleeping accommodation in basements at risk of flooding. • We are encouraged to see that developments adjacent to a tidal flood defence are required to maintain and improve the adjacent tidal flood defences, in line with the Thames Estuary 2100 Plan, including statutory raisings and providing sufficient condition lifetime. <p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> • We are supportive of the identification of the hospital as a potential previous contaminative use of the site. <p>Flood risk activity permit</p> <ul style="list-style-type: none"> • A flood risk activity permit (FRAP) will be required from the Environment Agency for activities within 16 metres of a tidal main river or flood defence structure.
<p>Site 8: 110 Stamford Street, SE1</p>	<p>Flood risk mitigation</p> <ul style="list-style-type: none"> • We welcome the restriction of only ‘less vulnerable’ uses at ground floor level and below. • We are encouraged to note the identification of ‘more vulnerable’ uses not being permitted below modelled breach flood levels. <ul style="list-style-type: none"> ○ We are pleased to note the further elaboration to specify the inappropriateness of self-contained residential uses and/or sleeping accommodation in basements at risk of flooding.
<p>Site 9: Gabriel's Wharf and Princes Wharf, SE1</p>	<p>Flood risk mitigation</p> <ul style="list-style-type: none"> • We welcome the protection of riverside buffer zones and tidal flood defences. <ul style="list-style-type: none"> ○ We further support the request for a 16-metre setback for all new development and the reference to London Plan Policy SI 12(f). ○ We are encouraged to see that all developments adjacent to a tidal flood defence are required to maintain and improve the adjacent tidal flood defences, in line with the Thames Estuary 2100 Plan, in line with the Thames Estuary 2100 Plan, including statutory raisings and providing sufficient condition lifetime.

	<ul style="list-style-type: none"> We have recommended the updated wording to reflect the PPG update from "50-60 years for commercial" to "75 years for non-residential". You may wish to consider including previously provided paragraphs which restrict the use of ground floor levels and below to 'less vulnerable' uses. <p>Flood risk activity permit</p> <ul style="list-style-type: none"> A flood risk activity permit (FRAP) will be required from the Environment Agency for activities within 16 metres of a tidal main river or flood defence structure.
Proposed Brixton Site Allocations	
Site 17: 330-336 Brixton Road, SW9	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> We are supportive of the identification of the nearby petrol station as a potential previous contaminative use of the site.
Site 20: Tesco, 13 Acre Lane, SW2	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> We are pleased to note the acknowledgement of the nearby groundwater borehole and the Source Protection Zone 2 designation. We support the recommendation to consider risks to groundwater sources associated with deep construction works.
Site 21: 51-57 Effra Road, SW2	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> We are pleased to note the acknowledgement of the nearby groundwater borehole and the Source Protection Zone 2 designation. We support the recommendation to consider risks to groundwater sources associated with deep construction works.
Proposed Streatham Site Allocation	
Site 3: 35-37 and car park, Leigham Court Road, SW16	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> We support the recommendation to consider risks to groundwater sources associated with deep construction works. We are supportive of the identification of the car park as a potential previous contaminative use of the site.
Proposed West Norwood/Tulse Hill Site Allocation	
Site 18: 300-346 Norwood Road, SE27	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> We recommend that the on-site petrol station is identified as a potential contaminative use of the site within the 'site context' section. <ul style="list-style-type: none"> This will align with other sites where on-site contaminative uses have been identified. We are pleased to note the acknowledgement of the nearby groundwater borehole and the Source Protection Zone 2 designation.
Proposed Kennington/Oval Site Allocation	

<p>Site 7: 6-12 Kennington Land & Wooden Spoon House, 5 Dugard Way, SE11</p>	<p>Flood risk mitigation</p> <ul style="list-style-type: none"> • We are pleased to note the correct identification of the areas of the site (northern section) being located within the 2100 modelled breach scenario. • We have identified a potential conflict of wording within the 'flood risk' section and the proposed 'land uses' of the site. <ul style="list-style-type: none"> ○ The existing NHS facility would be considered 'more vulnerable' in relation to flood risk. ○ The NHS facility, known as Wooden Spoon House, is located in the northern section of the site, within modelled breach flood extents. ○ The proposal suggests that the portion of the site within breach will be 'restricted to less vulnerable use only' <ul style="list-style-type: none"> ▪ The removal of this facility is on the basis that a strategy can be agreed to have it re-provided elsewhere, off-site. ▪ This does not appear to be certain at this stage and could lead to a contradiction if not corrected.
<p>Proposed Loughborough Junction Site Allocations</p>	
<p>Site 22: 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street, SE24</p>	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> • There appears to be no section relating to the risks to groundwater from contaminated land. We recommend its inclusion to remind developers of the risks posed by contaminated land to groundwater sources. • We have identified adjacent railway land as a potential contaminative use and suggest this is highlighted.
<p>Site 23: land at corner of Coldharbour Lane & Herne Hill Road, SE24</p>	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> • There appears to be no section relating to the risks to groundwater from contaminated land. We recommend its inclusion to remind developers of the risks posed by contaminated land to groundwater sources. • We have identified adjacent railway land as a potential contaminative use and suggest this is highlighted.
<p>Site 24: King's College Hospital, Denmark Hill, SE5</p>	<p>Groundwater and contaminated land</p> <ul style="list-style-type: none"> • We are pleased to note that the car park has been identified as a potential contaminative previous use of the site.

We hope you find our response helpful. Should you have any queries regarding this response, please contact us.

We thank you for the opportunity to provide comment on the proposed submission version of this document.

Yours sincerely,

Shea Bunyan
South London Sustainable Places Planning Advisor

E-mail [REDACTED]

From: Kysella Sopo Tadum [REDACTED]
Sent: 02 May 2024 18:05
To: SADPD
Cc: [REDACTED]
Subject: Places for London Response to Lambeth Site Allocation DPD; 02 May 2024
Attachments: 01 Places for London Reg 19 Reps Lambeth Site Allocation DPD 02 May 2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Purple category, Red category

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Thank you for the opportunity for Places for London to respond to the Lambeth Site Allocation DPD.

Places for London / TTLP is a dedicated commercial property company within Transport for London (TfL) and the forms attached in this correspondence are filled in by representatives of the TTLP Development Planning Team in TfL's capacity as a landowner. This submission is separate from any submission that may be made by TfL in its statutory planning role and/or as the strategic transport authority for London.

We would be grateful if you could confirm receipt of this representation. Should you have any queries, please do not hesitate to contact us via the propertyconsultation@tfl.gov.uk email.

Kysella Tadum | Planning and Development Assistant
Places for London | Transport for London
Victoria Station House, 7th Floor, 191 Victoria Street,
London, SW1E 5ND
E-mail: [REDACTED]



TfL RESTRICTED

This message has been scanned for malware by Forcepoint. www.forcepoint.com

Date: 02/05/2024

Our Ref: TfL CD / PD / Planning / HS /

Your Ref: Site Allocation DPD

Lambeth Civic Centre

6 Brixton Hill

SW2 1EG

By email: sadpd@lambeth.gov.uk

Dear Sir / Madam

RE: Lambeth Site Allocations Development Plan Document (DPD) – Proposed Submission Version (Jan 2024)

Places for London is pleased to provide its views on the Council's Regulation 19 Draft Site Allocations DPD. Please note that the views expressed in this letter and our site submissions are those of Places for London planning team in its capacity as a significant landowner and developer only, and do not form part of the Transport for London (TfL) corporate / statutory response. Our colleagues in TfL Spatial Planning have provided a separate response in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

Places for London

Places for London is TfL's financially independent property company, formerly known as TTL Properties under which name our previous representations were submitted. Places for London provides space for over 1,500 businesses in TfL stations and railway arches and on London's high streets. And now, it's working to release more of the untapped opportunity in TfL's property portfolio to deliver much-needed new homes and jobs to create places for Londoners to live, work and play which are sensitive to local needs and communities and improve access for all.

We would like to reiterate comments previously raised in our response to the Regulation 18 Lambeth Site Allocations DPD in 2022. This requested site allocations for the following TfL-owned sites, given their potential to contribute towards meeting the London Plan and Lambeth housing targets:

- Montford Place
- Nine Elms Station OSD
- Fenwick South
- North Vauxhall
- Land at Christchurch Road
- Brixton Bus Garage (former tram shed)
- Stockwell Station

In particular, Places for London wishes to promote the following sites:

- Land at Montford Place, Kennington
- Nine Elms Over Station Development (10 Pascal Street, SW8 4SH)

As you will be aware, the sites benefit from planning permission for residential-led mixed used development but are not included as site allocations in either the recently adopted Lambeth Local Plan (2021) or the draft Lambeth Site Allocations DPD. We believe that the Montford Place and Nine Elms OSD sites should be identified as site allocations within the Local Plan as they are going to come forward for development during the early Plan period. This would therefore provide an appropriate level of clarity and certainty to stakeholders.

Both sites form part of the Council's housing trajectory as set out in the Local Plan (2021) Annex 12. This further supports the view that the sites should be more clearly identified as site allocations.

The designated Key Industrial Business Area (KIBA) status of Montford Place is noted and this was addressed as part of the planning application via light industrial floorspace provision co-located with Build to Rent residential accommodation. Further details of both schemes are set out below:

Montford Place

At Montford Place, full planning permission (Ref: 20/01086/FUL) has been granted for a development comprising:

- Two main buildings, consisting of part 6 and 8 storeys (Block A) and part 7 and 11 storeys (Block B) providing a total of 139 Build to Rent homes;
- 2,715sqm GEA of flexible light industrial workspace in Class B1c use; and
- associated blue badge car parking, cycle parking, landscaping, highways and utilities works.

Nine Elms Over Station Development Blocks A, B and C

Similarly, the site at 10 Pascal Street is subject to full planning permission for the Nine Elms Over Station Development (OSD) (Ref: 20/02331/FUL) which was granted in December 2021. The approved development comprises:

- three new residential buildings of 21 storeys, 16 storeys and 17 storeys providing a total of 479 homes (Use Class C3),
- plus small scale commercial floorspace of 108m (Expanded Use Classes A1-A4 and D1),
- works within the Nine Elms Station 'boxes'; and
- a new public square, and associated works.

Both residential schemes are being taken forward as part of our Connected Living London Build to Rent programme and joint venture with Grainger. The permissions have been implemented via enabling works. We are currently undertaking minor design revisions to incorporate access to a second staircase to take into account the recent changes to Building Regulations and progress schemes in line with the Government's transitional arrangements.

In addition, Block D of the original Nine Elms OSD site also benefits from full planning permission for an 8-storey building office and ground floor retail use. This is as part of the original planning consent (Ref:15/06216/FUL). This land parcel should also be included within the Nine Elms OSD site allocation and is going to come forwards later, as it is required as a construction compound whilst the Build to Rent scheme is constructed.

To reiterate, we believe that both sites should be subject to site allocations which would help to provide an appropriate level of certainty and clarity within the Local Plan as well as supporting our own short, medium and longer term development aims.

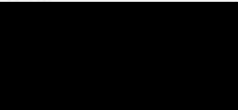
We trust that the enclosed is in order. Please do not hesitate to contact me on the details provided if you wish to discuss any of the content.

Yours faithfully



Andrew Russell
Principal Commercial Planner
Places for London

CC.



Places for London
Places for London
Places for London

From: Parsons, Katie [REDACTED]
Sent: 02 May 2024 18:00
To: SADPD
Subject: Lambeth Draft Site Allocations Development Plan Document (SADPD) Regulation 19
Attachments: final Reg 19 SADPD response.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red category, Purple category

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Dear Planning Policy Team,

Please see attached comments in relation to the above consultation. I hope that these are helpful.

Regards

Katie Parsons BA (Hons) MA MSc IHBC MRTPI
Team Leader Development Advice
London and South East Region

Mobile: [REDACTED]
Historic England
4th Floor Cannon Bridge House | 25 Dowgate Hill | London EC4R 2YA
www.historicengland.org.uk



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Lambeth Council,
Planning Policy and Strategy,
PO Box 734,
Winchester,
SO23 5DG

Our ref: PL00016928
Date: 02/05/2024

By email: sadpd@lambeth.gov.uk

Dear Planning Policy Team,

Re: Lambeth Draft Site Allocations Development Plan Document (SADPD) Regulation 19

Thank you for your notification of the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the planning process. Therefore, we welcome the opportunity to comment on the draft document.

Historic England Advice

Generally, the draft SADPD has been amended to reflect our previous concerns. We also recognise that the evidence base has been expanded in line with our previous advice. At this stage the SADPD appears to be sound.

- We welcome the clarity provided on the SADPD maps which express maximum heights in metres AOD.
- The individual policy criteria relating to the historic environment and townscape are appropriate in our view.
- The evidence demonstrates a design-led approach to site capacity that builds off the local plan's up to date evidence base.
- We advise that a Heritage Impact Assessment (HIA), which reflects the ICOMOS HIA Guidance is submitted upon application for future development proposals that come forward on the St Thomas's Hospital and Royal Street sites. This should consider the cumulative impacts of these developments, alongside others that have been approved, to help properly understand the impact upon the Westminster World Heritage Site (WWHS). The Operational Guidelines for the Implementation of the World Heritage Convention were updated in September 2023¹ and stress the importance of Heritage Impact Assessment, noting at paragraph 118bis that these should be a pre-requisite for development projects and activities that are planned for implementation within or around a World Heritage property.
- Where any further guidance is intended, for example in the form of site-specific Supplementary Planning Documents or master-plans, we would encourage you to engage with us at the earliest possible to stage.

¹Operational Guidelines WHC.23/01 24 September 2023 <https://whc.unesco.org/en/guidelines/>





- We would be happy to agree a Statement of Common Ground to further refine points of agreement or otherwise.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

I hope that these comments will be helpful. I am happy to comment on any evidence documents or assessment methodologies before the next version of the plan is published.

Regards

Katie Parsons
Development Advice Team Leader, London



From: Williams, Gemma [REDACTED]
Sent: 02 May 2024 18:52
To: SADPD
Subject: Lambeth Site Allocations Development Plan Document: Proposed Submission Version (Regulation 19 Consultation)
Attachments: London Borough of Southwark - Regulation 19 response.pdf
Follow Up Flag: Follow up
Flag Status: Flagged
Categories: Purple category, Red category

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To Planning Policy and Place Shaping,

Please see the attached response from the London Borough of Southwark to the **Lambeth Site Allocations Development Plan Document: Proposed Submission Version (Regulation 19 Consultation)**.

We would appreciate a confirmation that this response has been received.

Thanks,
Gemma

Gemma Williams MRTPI (she/her)
Team Leader | Planning Policy and Monitoring Innovation
Finance | Planning and Growth
London Borough of Southwark | 160 Tooley Street | London SE1P 5LX

E: [REDACTED]
T: [REDACTED]

This is the opinion of the officer and is given without prejudice to any formal decision of the Council
www.southwark.gov.uk

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Lambeth Site Allocations Development Plan Document: Proposed Submission Version

Regulation 19 Consultation

London Borough of Southwark response - Updated August 2024

Sites near Southwark boundary

- Proposed site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11
- Proposed site 9: Gabriel's Wharf and Prince's Wharf, Upper Ground, SE2
- Proposed site 24: King's College Hospital, Denmark Hill, SE5

Proposed site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11

Proposed site 7 is not within immediate proximity of any LB Southwark heritage assets, however any tall building developments at this site would be in the path of the view from Elliot's Row conservation area and potentially from West Square conservation area also. If any tall buildings were to be brought forward on this site, then the developments would have to consider the impact the works would have on the character, appearance and setting of these heritage assets.

It is noted that the design evidence paper for this site allocation references the West Square conservation area and the Elliot's Row conservation area (paragraph 2.12). The conservation areas are also included under 'Site specific design drivers' with a reference to 'Respect heritage assets' (paragraph 3.1 A). The inclusion of these heritage assets is welcomed within this design paper.

LB Southwark further requests these heritage assets to be referenced within the adopted Site Allocation as a relevant consideration for any tall development.

Officers from LB Lambeth and LB Southwark discussed the indicative height and massing for proposed site 7 during Duty to Cooperate meetings using views taken from the VuCity model. Consideration was given to the potential impact of the site allocation, with particular attention given to heritage and townscape. Officers from Southwark confirmed they had no concerns regarding the indicative height and massing for proposed site 7.

Although there were no concerns with the indicative heights, views of any proposed tall development which comes forward on this site could still be tested by developers. This would be useful to confirm that the proposed tall development does not cause an adverse impact on the character, appearance and setting of these heritage assets.

Proposed site 9: Gabriel's Wharf and Prince's Wharf, Upper Ground, SE2

Proposed site 9 is within proximity of the Old Barge House Alley conservation area and any future developments would have to consider the impact the works would have on the character, appearance and setting of this designated heritage asset. Any building with taller elements would also have to be considerate of the OXO Tower which has been locally listed since the regulation 18 consultation.

It is noted that the design evidence paper for this site allocation references the Old Barge House Alley conservation area (paragraph 2.31). The conservation area is also included under 'Site specific design drivers' with a reference to 'Respect heritage assets' (paragraph 3.1 A). The inclusion of this heritage asset is welcomed within this design paper.

LB Southwark further requests this heritage asset to be referenced within the adopted Site Allocation, as well as the now locally listed OXO tower, as a relevant consideration for any tall development. Developers could test the views of any proposed tall development from Barge House Alley conservation area and OXO Tower. This could be useful to demonstrate that the proposed tall development does not cause an adverse impact on the character, appearance and setting of the designated and non-designated heritage assets.

Proposed site 24: King's College Hospital, Denmark Hill, SE5

Proposed site 24 is opposite the Grade II listed Maudsley Hospital building and boundary of Camberwell Grove conservation area and any future developments would have to consider the impact the works would have on the character, appearance and setting of these heritage assets. Although not listed, the tower at the Guthrie entrance is a local landmark which is important to wayfinding in the area and should be retained in any future development.

It is noted that the design evidence paper for this site allocation references many heritages assets within Southwark (paragraph 2.15):

- Ruskin Park (registered landscape).
- Camberwell Grove Conservation Area
- Camberwell Green Conservation Area
- Nos. 93, 95 and 97 Denmark Hill (grade II)
- Nos 99 and 103 Denmark Hill (grade II)
- Maudsley Hospital Administration Block, Denmark Hill (grade II)
- Nos 111 Denmark Hill (grade II)
- Railings to the Maudsley Hospital, Denmark Hill (grade II)

These heritage assets are also included under 'Site specific design drivers' with a

reference to 'Respect heritage assets' (paragraph 3.1 A). The inclusion of these heritage assets is welcomed within this design paper.

LB Southwark further requests these heritage assets to be referenced within the adopted Site Allocation as a relevant consideration for any tall development. Developers could test the views of any proposed tall development along De Crespigny Park and Windsor Walk as well as north and south on Denmark Hill (within the CA). This could be useful to demonstrate that the proposed tall development does not cause an adverse impact on the character, appearance and setting of the heritage assets.

If done sensitively, comprehensive redevelopment of the site would be welcomed and considered an improvement to the area.

Lambeth Site Allocations Development Plan Document: Proposed Submission Version

Regulation 19 Consultation

London Borough of Southwark response

Sites near Southwark boundary

- Proposed site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11
- Proposed site 9: Gabriel's Wharf and Prince's Wharf, Upper Ground, SE2
- Proposed site 24: King's College Hospital, Denmark Hill, SE5

Proposed site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way, SE11

Proposed site 7 is not within immediate proximity of any LB Southwark heritage assets, however any tall building developments at this site would be in the path of the view from Elliot's Row conservation area and potentially from West Square conservation area also. If any tall buildings were to be brought forward on this site, then the developments would have to consider the impact the works would have on the character, appearance and setting of these heritage assets.

LB Southwark does not consider proposed site 7 to be a suitable location for a tall building as it is not within the established tall building clusters at Elephant and Castle. Although there are other taller buildings in the area, the building heights drop down significantly towards this site.

Proposed site 7 is further not considered to be suitable for tall building development as it is not located at a point of landmark significance. Tall buildings can often become landmarks and prominent features on the city skyline due to their scale, and therefore developments should be located where this landmark status can emphasis a point of civic or visual significance.

It is noted that the design evidence paper for this site allocation references the West Square conservation area and the Elliot's Row conservation area (paragraph 2.12). The conservation areas are also included under 'Site specific design drivers' with a reference to 'Respect heritage assets' (paragraph 3.1 A). The inclusion of these heritage assets is welcomed within this design paper.

LB Southwark further requests these heritage assets to be included within the adopted Site Allocation as a relevant consideration for any tall development. This should have a requirement to test the views of any proposed tall development from these conservation areas. This should demonstrate that the proposed tall development does

not cause an adverse impact on the character, appearance and setting of these heritage assets.

Any developments on this site should also consider the permeability of LB Southwark's surrounding roads and avoid disconnecting the wider area from the site.

Proposed site 9: Gabriel's Wharf and Prince's Wharf, Upper Ground, SE2

Proposed site 9 is within proximity of the Old Barge House Alley conservation area and any future developments would have to consider the impact the works would have on the character, appearance and setting of this designated heritage asset. Any building with taller elements would also have to be considerate of the OXO Tower which has been locally listed since the regulation 18 consultation.

LB Southwark does not consider proposed site 9 to be a suitable location for a tall building as it is not located at a point of landmark significance. Development on this site should sit with or below the height of the IBM building and London Studios and should also relate to the surrounding riverfront.

It is noted that the design evidence paper for this site allocation references the Old Barge House Alley conservation area (paragraph 2.31). The conservation area is also included under 'Site specific design drivers' with a reference to 'Respect heritage assets' (paragraph 3.1 A). The inclusion of this heritage asset is welcomed within this design paper.

LB Southwark further requests this heritage asset to be included within the adopted Site Allocation, as well as the now locally listed OXO tower, as a relevant consideration for any tall development. This should have a requirement to test the views of any proposed tall development from the Barge House Alley conservation area and OXO Tower. This should demonstrate that the proposed tall development does not cause an adverse impact on the character, appearance and setting of the designated and non-designated heritage assets.

Proposed site 24: King's College Hospital, Denmark Hill, SE5

Proposed site 24 is opposite the Grade II listed Maudsley Hospital building and boundary of Camberwell Grove conservation area and any future developments would have to consider the impact the works would have on the character, appearance and setting of these heritage assets. Although not listed, the tower at the Guthrie entrance is a local landmark which is important to wayfinding in the area and should be retained in any future development.

It is noted that the design evidence paper for this site allocation references many heritages assets within Southwark (paragraph 2.15):

- Ruskin Park (registered landscape).
- Camberwell Grove Conservation Area

- Camberwell Green Conservation Area
- Nos. 93, 95 and 97 Denmark Hill (grade II)
- Nos 99 and 103 Denmark Hill (grade II)
- Maudsley Hospital Administration Block, Denmark Hill (grade II)
- Nos 111 Denmark Hill (grade II)
- Railings to the Maudsley Hospital, Denmark Hill (grade II)

These heritage assets are also included under 'Site specific design drivers' with a reference to 'Respect heritage assets' (paragraph 3.1 A). The inclusion of these heritage assets is welcomed within this design paper.

LB Southwark further requests these heritage assets to be included within the adopted Site Allocation as a relevant consideration for any tall development. This should have a requirement to test the views of any proposed tall development along De Crespigny Park and Windsor Walk as well as north and south on Denmark Hill (within the CA). This should demonstrate that the proposed tall development does not cause an adverse impact on the character, appearance and setting of the heritage assets.

If done sensitively, comprehensive redevelopment of the site would be welcomed and considered an improvement to the area. The redevelopment of the site would also be a good opportunity to enhance the legibility and improve permeability, wayfinding and pedestrian and cycle routes from Denmark Hill. King's College Hospital should be encouraged to develop a masterplan for the site to aid redevelopment as this has proved successful on the opposite Maudsley Hospital site.

Any new developments on the Denmark Hill elevation should preferably be set back the same distance as the building's at Maudsley Hospital. The set-back will prevent any impact to the listed buildings and conservation area opposite. New developments on the Denmark Hill elevation would also preferably have the same shoulder height as the buildings at Maudsley Hospital.

From: Csuka, Kerry [REDACTED]
Sent: 09 May 2024 11:49
To: SADPD
Subject: FW: Representations - Proposed Site 21 - 51-57 Effra Road SW2
Attachments: Representations to Reg 19 SADPD - 51-57 Effra Road.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Blue category

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Hi there,

Can it please be confirmed that you received receipt of the reps we submitted last Friday, as per below?

Many thanks,
Kerry

Kerry Csuka

Associate – Planning and Development
JLL
30 Warwick Street | London | W1B 5NH

M [REDACTED]
[REDACTED]

My working day: I sometimes send emails out of hours; I do not expect others to do so

From: Csuka, Kerry
Sent: Friday, May 3, 2024 5:49 PM
To: sadpd@lambeth.gov.uk
Subject: Representations - Proposed Site 21 - 51-57 Effra Road SW2

Dear Sir/Madam

**REPRESENTATIONS TO REGULATION 19 SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT
PROPOSED SITE ALLOCATION 21 - 51-57 EFFRA ROAD**

On behalf of Site owners LPPI Real Estate Fund (managed by Knight Frank Investment Management), JLL Planning have prepared representations in respect to Proposed Site 21: 51-57 Effra Road. These representations are submitted in relation to consultation on the Site Allocations Development Plan Document Proposed Submission Version (Regulation 19).

Please find our written representations attached.

Would it please be possible to confirm receipt for our records?

Kind regards,

Kerry Csuka
Associate – Planning and Development
JLL
30 Warwick Street | London | W1B 5NH

M [REDACTED]
[REDACTED]

My working day: I sometimes send emails out of hours; I do not expect others to do so



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365



51 – 57 Effra Road

Representations Prepared by JLL on behalf of LPPI Real Estate Fund (managed by Knight Frank Investment Management) (“LPPI”)

Introduction

This representation is made on behalf of LPPI Real Estate Fund (“LPPI”), managed by Knight Frank Investment Management, who have an interest in 51 - 57 Effra Road, Brixton, SW2 1BZ.

The Site comprises two out-of-town retail units currently occupied by Halfords and Currys, as well as extensive forecourt parking. Together, the two units form a single site allocation which is identified as ‘Proposed Site 21: 51 - 57 Effra Road SW2’ within Section 3 (pages 82-93) of the Lambeth Regulation 19 Site Allocations Development Plan Document Proposed Submission Version (“Reg 19 SADPD”) document.

A red line boundary of the site allocation is shown below:



The London Borough of Lambeth (LBL) have set out the overarching vision for how the Site should be redeveloped on page 86 of the Reg 19 SADPD, which is shown overleaf:

Vision: Proposed Site 21: 51–57 Effra Road SW2

An opportunity to bring forward high-quality, mixed-use development that can contribute new workspace and jobs within the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C), and new housing and affordable housing within an existing residential neighbourhood, all within walking and cycling distance of Brixton town centre. New development will provide improvements to the quality of the Rush Common open space, with new green space and trees to improve amenity and air quality and assist with sustainable urban drainage in an area at risk of surface water flooding. New buildings will reinstate the historic building line along Effra Road, respect local views and preserve or enhance the setting of the Brixton Conservation Area and other nearby heritage assets. It will provide a strong sense of place, with a unified architectural character that reflects and enhances the local distinctiveness of this part of Brixton.

Full details of the proposed site allocation have been extracted from the Reg 19 SADPD and are detailed in **Appendix 1**.

It is noted and welcomed that the site allocation recognises the redevelopment opportunity and the commitment to delivering a high-quality, mixed-use development on the site. We also welcome the commitment to providing new residential and employment opportunities that complement the existing area. The commitment to creating a strong sense of place that reflects and enhances the local distinctiveness of this part of Brixton is also welcomed and supported. We also support the retention of the existing green space at Rush Common as an important landscape buffer to any future development proposals.

It is welcomed that the site allocation boundary has been amended since the Regulation 18 SADPD, which included Fitch Court, Masey Mews, Brixton Unitarian Church and Mosaic Centre. This is primarily driven by the challenge that a wider site allocation would bring by including a range of uses and across multiple ownerships. The LPPI land is within single ownership and is capable of being brought forward for development completely independently and we welcome that this has been recognised.

Planning History

No planning applications have been submitted for the Site's comprehensive redevelopment.

Pre-application discussions have been held with Officers at LBL to discuss the comprehensive redevelopment of the Site (pre-application references 20/02037/PREAPP and 21/00332/PREAPP). A total of three pre-application meetings have been held with LBL to date, the details of which are set out in the table below:

Date	Meeting Type	Proposals Presented
23 rd July 2020	Pre-application meeting 1	Design Option 1: 263 residential units, buildings rising up to 12 storeys Design Option 2: 219 residential units, buildings rising up to 12 storeys Design Option 3: 243 residential units, buildings rising up to 18 storeys
5 th October 2020	Follow-up pre-application meeting 1	Presentation of massing study/design development.
2 nd December 2020	Pre-application meeting 2	Design Option 01: 263 residential units, buildings rising up to 12 storeys

		<p>Design Option 02: 263 residential units, buildings rising up to 12 storeys</p> <p>Design Option 03: 243 residential units, buildings rising up to 18 storeys</p> <p>Design Option 04: 178 residential units, buildings rising up to 9 storeys, 500sqm of commercial floorspace</p> <p>Design Option 05: 190 residential units, buildings rising up to 9 storeys, 800sqm of commercial floorspace</p> <p>Design Option 06: 211 residential units, buildings rising up to 9 storeys, 750sqm commercial floorspace</p>
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A formal written pre-application response was received on 8th March 2021. In regard to land use, Officers concluded that the introduction of residential into a mixed-use scheme is supported in principle. The loss of retail floorspace could be supported subject to justification and the provision of employment floorspace that aligns with the aspirations of the Creative Enterprise Zone.

In terms of scale and massing, comments raised by LBL Officers within the pre-application response are summarised below:

- The general height strategy to position houses to the rear of the site, lower blocks centrally and potentially a taller block fronting Effra Road is broadly acceptable subject to careful consideration of massing, amenity impacts on surrounding context and impacts on designated local views.
- The location of the tallest element fronting Effra Road, whilst acceptable in principle, the height threshold will be determined by how it relates to the adjacent site at Fitch Court and its impact upon designated local views and general townscape views.
- The general height strategy to position lower blocks centrally across the site is considered an appropriate approach to mitigate harm caused to local views. The proposal illustrates central blocks at 6, 5 and 4 storeys. From the long range views submitted, 4 storey blocks are unlikely to pose harm to views of Brixton towers. There is likely to be a degree of harm to local views posed by the 5 storey blocks, any proposal will need to demonstrate through rendered closer range views how the proposal will impact upon the composition of the views.
- [Options 04, 05 and 06] The site layout, typology, height and massing strategy has evolved in a positive manner in regard to local views and townscape from options 01, 02 and 03. Further interrogation of the impact upon local views composition will be required using closer range / rendered views.

The formal pre-application response indicated that scheme options 04, 05, and 06 showed encouraging progress. Although concerns were raised around particular areas of height and massing, Officers emphasised the need for further design testing and development in order to ensure the creation of a carefully considered scheme.

Representation Considerations

Consideration 1a: Land Uses (Creative Enterprise Zone)

The site is located within the Brixton Creative Enterprise Zone (CEZ). Lambeth Local Plan Policy PN3 (Brixton) Part E states that the Council will support the promotion and growth of the existing cluster of creative and digital industries active in Brixton and complement the wider aspirations for Brixton's economy. Furthermore, *"Applications within the CEZ for development including office, research and development and light industrial floorspace will be supported where:*

- i. maximise the amount of market, flexible, low-cost and affordable workspace suitable for creative and digital industries in accordance with Local Plan policies ED1 and ED2;
- ii. provide a mix of workspace typologies for different types and sizes of businesses with a focus on start-up, incubator and grow-on space for creative and digital industries that diversify and strengthen the sector; and
- iii. provide space, such as meeting rooms and exhibition spaces, which promotes networking and information sharing between businesses and sectors within the creative and digital industries and that can be accessed by local community groups.

The pre-application response states that *"Overall the loss of retail floorspace could be supported subject to justification and provision of employment floorspace that aligns with the aspirations of the Creative Enterprise Zone."*

The proposed site allocation sets out that *"Redevelopment should include light industrial workspace appropriate to the Brixton CEZ"*. This is also outlined within the Vision diagram. A light industrial workspace use does not incorporate all uses that could complement and support the CEZ. The wording does not align with Lambeth Policy PN3, which provides examples of various other CEZ uses and functions including office and research and development. This should not be restricted only to any one specific use, when the ambition of the CEZ is to accommodate various creative and digital industries.

Additionally, light industrial and residential uses do not co-locate well (vertically) and are extremely challenging (if not impossible) to fund and deliver in the commercial markets. Horizontal colocation of these uses will also significantly underutilise the available land as part of any redevelopment, making such a scheme unviable. Importantly, failure to allow flexibility will significantly undermine the aspiration for residential uses within a mixed-use development on the site, as well as negatively impact scheme viability and deliverability.

Therefore, we would like to see the wording on page 88 of *"Redevelopment should include new light industrial workspace appropriate to the Brixton Creative Enterprise Zone..."* amended to *"Redevelopment should include employment floorspace appropriate to the Brixton Creative Enterprise Zone..."* to accommodate for the multitude of uses that fall under the CEZ.

Consideration 1b: Land Uses (Residential)

In terms of the residential use, we would encourage the Council to provide commentary on the flexibility to provide alternative residential uses which can provide a more viable alternative to support traditional affordable housing, such as Purpose Built Student Accommodation (PBSA), Purpose Built Shared Living (PBSL), or Retirement Living (Use Class C2). Alternative residential uses are supported by the London Plan (Policies H11, H15, H16) and LBL's Local Plan (Policies H7, H8, H12, H13) subject to meeting London and Lambeth specific requirements.

Consideration 2: Number of Dwellings

Page 88 states that the Site as a whole has the potential to accommodate 85 – 95 self-contained residential units (gross).

During pre-application discussions, Officers acknowledged that the site layout, typology, height and massing strategy of Options 04, 05 and 06 had evolved in a positive manner in regard to local views and townscape from options 01, 02 and 03. Options 04, 05 and 06 proposed residential-led, mixed use proposals comprising between 178 and 211 residential units. Officers noted that the proposed building heights would need to be tested further to ensure no adverse impact on local views, the adjacent Conservation Area and neighbouring properties.

The proposal for a site capacity of 85 - 95 self-contained residential units is a substantial deviation from the Options 04, 05 and 06 design proposals which, although require further design testing, accommodated between 178 – 211 residential units. These Options were determined by a ‘design-led’ approach. This is in line with the NPPF, and London Plan and Lambeth Local Plan policies.

Chapter 11 of the NPPF states that planning decisions should promote an effective use of land in meeting the need for new homes. London Plan Policies D1 - D4 also place a great importance on a design-led approach which makes the best use of land for new developments, with consideration of factors including site context, the capacity of surrounding infrastructure and public transport, walking and cycling accessibility. Local Plan Policy H1 (Maximising housing growth) part (iii) states that the Council will seek to optimise levels of residential density in accordance with the design-led approach set out in London Plan Policy D1B.

Additionally, such a low number of dwellings on a site of this size and with a valuable existing use will result in a completely unviable scheme, which would therefore never come forward.

In light of the above, we strongly advocate that the unit number range is increased to take into account pre-application discussions, to 200 - 250 self-contained residential units (gross).

Consideration 3: Building Heights

Within diagram “*Vision for Proposed Site 21*” on page 87 of the Reg 19 SADPD, it states that for a large proportion of the Site, 14 metres is the maximum building height permitted. We are strongly opposed to an arbitrary limit on height which could inhibit innovative solutions and approaches to height, massing and density being found which may be required to help unlock the full development potential of this site.

As the pre-application response sets out throughout, proposed building heights should be subject to further design development and testing in respect to townscape views, local views and relationship to Fitch Court.

We would advocate the rewording of this section that removes any reference to an upper height limit. Instead, the wording should focus on finding design-led solutions that are supported by technical analysis of key elements such as strategic / local views, daylight / sunlight impact, overlooking, and appropriateness for the locality. Therefore, we would suggest that the “Maximum building height 14m” is amended to “General building height 14m”.

It is important to consider that Fitch Court and other land to the south of the Site has been considered for future redevelopment. Any redevelopment of these sites in the future would likely propose an increase in building height along the Effra Road frontage.

We support and agree that building heights should be stepped and arranged to avoid unacceptable impacts on neighbour amenity.

We are aware that any planning application for a taller building element within this site allocation will need to be rigorously tested as part of the scheme development and should not be prematurely restricted in height. Failure to remove this arbitrary upper height restriction could render the site allocation unviable and ultimately undeliverable. A more flexible approach to upper height limits will enable innovative design solutions to be found and a design-led approach to prevail.

Consideration 4: Scheme Viability

Although not explicitly mentioned in the supporting text of the Draft Lambeth SADPD, the site allocation should support the use of a Financial Viability Appraisal (FVA) so that a balance between site aspirations and scheme viability can be found. Where a scheme cannot viably support all elements of the site allocation, some flexibility should be allowed to ensure that the wider aspirations for this important site within the Creative Enterprise Zone can be realised. This will ensure that scheme proposals within the site allocation remain viable and deliverable. We would request that acknowledgement is made to the fact that the Site is constrained, given the local views and residential surrounding properties. Therefore, viability for a scheme including commercial uses and policy compliant affordable housing is likely to be challenging.

Conclusion

In conclusion, we are supportive of Lambeth Borough Council's recognition of the Site's redevelopment potential for a mixed-use development. However, to ensure that a scheme can be brought forward on the Site, it is crucial that the following points are addressed:

- Wording “*Redevelopment should include new light industrial workspace appropriate to the Brixton Creative Enterprise Zone...*” is amended to “*Redevelopment should include employment floorspace appropriate to the Brixton Creative Enterprise Zone...*” to accommodate for the multitude of uses that fall under the CEZ.
- Encourage the Council to provide commentary on the flexibility to provide alternative residential uses, such as Purpose Built Student Accommodation (PBSA), Purpose Built Shared Living (PBSL), or Retirement Living (Use Class C2).
- The proposed unit number range is increased to take into account pre-application discussions to 200 - 250 self-contained residential units (gross).
- Wording “*Maximum building height 14m*” is amended to “*General building height 14m*”.
- Consideration of the viability challenges. Where a scheme cannot viably support all elements of the site allocation, some flexibility should be allowed to ensure that the wider aspirations for this important site within the Creative Enterprise Zone can be realised.

Appendix 1: ‘Proposed Site 21: 51 – 57 Effra Road SW2’ within the Lambeth Regulation 19 SADPD Proposed Submission Version

Proposed Site 21: 51–57 Effra Road SW2

Key

- | | | |
|--|--|--|
|  Site Boundary |  Statutorily Listed Building |  Key Road |
|  Archaeological Priority Area |  Conservation Area |  Bus Stop |
| |  Key Industrial and Business Area | |
| |  Rush Common | |



Context	Proposed Site 21: 51–57 Effra Road SW2
Site address and postcode	51–57 Effra Road SW2
Ward	Brixton Rush Common
Site area	1.07 ha
Land ownership	The site is in private ownership.
Existing land uses	Effra Road retail park – 3,456 sqm GIA of retail floorspace across two large sheds.
Local Plan Place and Neighbourhood policy	PN3: Brixton
London Plan and Local Plan designations	The site falls within: <ul style="list-style-type: none"> • Brixton Creative Enterprise Zone • The site is not within a town centre
Neighbourhood Development Plan	None
Community Infrastructure Levy charging zones	<ul style="list-style-type: none"> • Lambeth CIL Zone C • MCIL2 Band 2
Heritage assets	<p>Within the site:</p> <ul style="list-style-type: none"> • Art Deco lamp-post (local list) <p>Near the site:</p> <ul style="list-style-type: none"> • Brixton Conservation Area to the north • 43 and 45 Effra Road (Grade II) • Lambeth Town Hall (Grade II) • St Matthew's Church (Grade II*) • 47 and façade of 49 Effra Road (local list)
Views	<p>No strategic views.</p> <p>Local views (Policy Q25):</p> <ul style="list-style-type: none"> • (c) (i) View NNW from Brockwell Park to (a) Lambeth Town Hall tower • (c) (i) View NNW from Brockwell Park to (b) St Matthew's Church tower • (c) (i) View NNW from Brockwell Park (c) N and NNE to the City
Transport and access	<ul style="list-style-type: none"> • PTAL 6a • Effra Road is a London Distributor Road • Site in Railton Low Traffic Neighbourhood • Nearest cycle hire docking station on Saltoun Road • There are narrow footways walking towards Brixton • Within the Brixton Controlled Parking Zone
Air Quality Focus Area	No
Energy	Located in a Heat Network Priority Area

Context	Proposed Site 21: 51–57 Effra Road SW2
Flood risk	<p>The site is located in Flood Zone 1.</p> <p>The EA's model and Lambeth's ICM model show a high risk (3.3 per cent AEP) of flooding to the site from surface water, with depths between 0.30 and 0.60m during a 1 per cent Annual Exceedance Percentage event.</p> <p>The source of this water is likely to be from flows within the highway generated by the large upper catchment. This water then flows through the site entrance from Effra Road. According to the current models the flood water reaches existing residential properties along Dalberg Road.</p>
Groundwater and contaminated land	<p>The site is located within the Source Protection Zone 2 area for the public groundwater supply borehole in Brixton, operated by Thames Water.</p>
Access to open space and nature conservation	<p>Rush Common adjoins the site and runs along both sides of Effra Road. St Matthew's Church Gardens is within 200m of the site and Brockwell Park is within 500m of the site.</p> <p>The site is within an area of open space deficiency for regional parks.</p>
Trees	<p>No Tree Preservation Orders (TPO) located on or adjacent to the site.</p>
Community safety	<p>Recorded crimes in Brixton Rush Common ward May 2021 – April 2023: 2,559</p> <p>Most common offences during this period:</p> <ul style="list-style-type: none"> • Violence against the person: 692 • Theft: 449 • Other accepted crime: 298 • Vehicle offences: 239 <p>Recorded crimes in Brixton Rush Common ward April 2023: 101</p> <p>Most common offences during this period:</p> <ul style="list-style-type: none"> • Theft: 22 • Violence against the person: 20 • Other accepted crime: 14 • Arson and criminal damage: 10
Description of current site character	<p>Two large retail sheds with extensive forecourt parking. The Rush Common designation runs along the part of the site fronting Effra Road, providing a welcome sense of openness and greenery.</p>
Neighbour context	<p>Terraced housing to the east (Dalberg Road) and sheltered housing (Fitch Court) to the south. Fitch Court is an inward-looking development of two storeys in height and dates from the 1980s / 1990s. To the west, across Effra Road, a medium-rise residential housing estate (St Matthew's Estate) set in Rush Common landscape. The Eurolink Business Centre, a designated Key Industrial and Business Area, is immediately to the north of the site.</p>
Relevant planning history	<p>None</p>

Vision: Proposed Site 21: 51–57 Effra Road SW2

An opportunity to bring forward high-quality, mixed-use development that can contribute new workspace and jobs within the Brixton Creative Enterprise Zone (in accordance with London Plan [Policy HC5C](#)), and new housing and affordable housing within an existing residential neighbourhood, all within walking and cycling distance of Brixton town centre. New development will provide improvements to the quality of the Rush Common open space, with new green space and trees to improve amenity and air quality and assist with sustainable urban drainage in an area at risk of surface water flooding. New buildings will reinstate the historic building line along Effra Road, respect local views and preserve or enhance the setting of the Brixton Conservation Area and other nearby heritage assets. It will provide a strong sense of place, with a unified architectural character that reflects and enhances the local distinctiveness of this part of Brixton.

Vision for Proposed Site 21: 51-57 Effra Road SW2

Key

- Site boundary

New building line

Indicative location for new servicing/access route

Sensitive residential neighbour
- ① Height in metres of existing neighbouring building

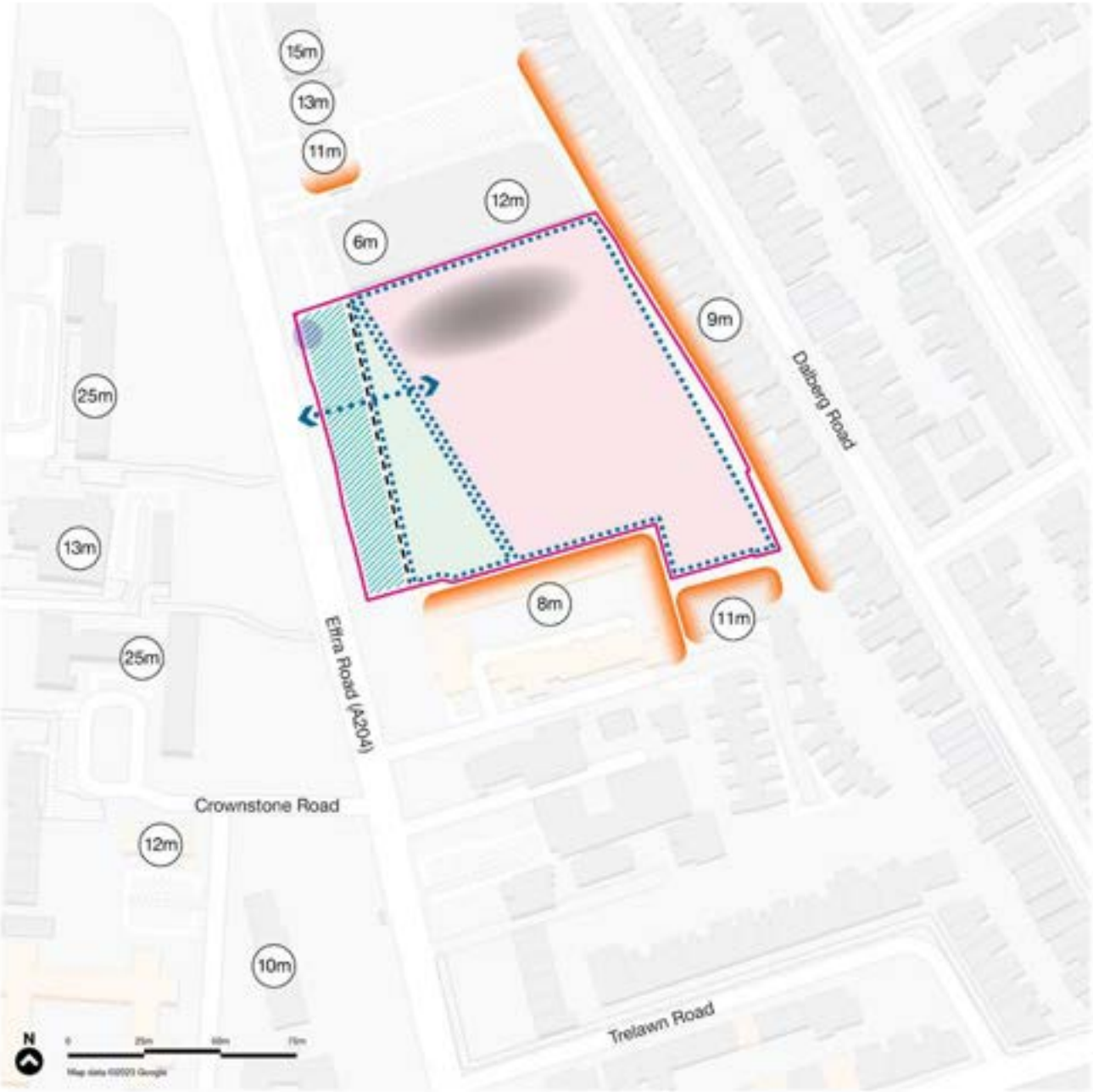
Area suitable for light industrial workspace

Maximum building height 14m

General building height 26-29m

Locally listed lamp column to be retained

Enhanced Rush Common public realm



Site Allocation Policy	Proposed Site 21: 51–57 Effra Road SW2
Land uses	<p>The site provides an opportunity for comprehensive mixed-use redevelopment, which is likely to achieve optimum development capacity and the best place-shaping outcome.</p> <p>Redevelopment should include new light industrial workspace appropriate to the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C); and new housing, including affordable housing.</p> <p>The site as a whole has potential to accommodate:</p> <ul style="list-style-type: none"> • Approximately 85 to 95 self-contained residential units (gross) • Flexible, light industrial workspace is appropriate at the northern end of the site <p>Industrial uses should be completed in advance of occupation of new residential accommodation on the site, unless the applicant can demonstrate to the satisfaction of the LPA that this is not feasible. This requirement will be secured by condition or through a legal agreement.</p> <p>Given Lambeth's location in the Central Services Area, applicants should consider the potential to include space for industrial uses that can provide essential services to the CAZ in accordance with paragraph 6.4.7 of the London Plan 2021. These services could include sustainable last mile distribution/logistics or 'just-in-time' servicing, for example, and should include operational yard space where feasible. Applicants should demonstrate in their proposals how the potential for including these uses has been considered and explain the outcome of that consideration.</p>
Affordable housing	The affordable housing threshold is 35 per cent.
Social infrastructure	The requirements of Local Plan Policy S2 in relation to new social infrastructure and assessment of anticipated impacts on existing social infrastructure should be addressed.
Employment and skills	<p>Development should maximise local employment opportunities and help address skills deficits in the local population. This is to be achieved through meeting the requirements of Local Plan Policy ED15, including agreement of an Employment and Skills Plan.</p> <p>Given potential to create new workspace on this site within the Brixton Creative Zone, there is a particular opportunity to provide jobs and skills training for local people in the creative industries.</p>
Digital connectivity	Provision for digital connectivity infrastructure is required in accordance with Local Plan Policy T9 and London Plan Policy SI6 .
Heritage assets	<p>The locally listed lamp column should be repaired and brought back into working order. Should relocation be necessary the lamp should be placed in a publicly accessible area within the site.</p> <p>Development should preserve or enhance the significance (including settings) of nearby heritage assets.</p> <p>Where heritage harm results proposals will be required to meet the requirements of the National Planning Policy Framework.</p>

Site Allocation Policy	Proposed Site 21: 51–57 Effra Road SW2
Building design, views and townscape	<p>The site is not identified as appropriate for tall building development, defined as over 45m in this location. Heights are restricted by local views constraints. Given the local views constraints, heights should range from a maximum of 14m in the east to approximately 26–29m to the west and be stepped and arranged to avoid unacceptable impacts on neighbour amenity.</p> <p>Development should also observe the following principles:</p> <ul style="list-style-type: none"> • Reinststate the historic building line to Effra Road. • Ground floor residential units should, where possible, have their own front doors to the street rather than be accessed through communal cores, to maximise activity and surveillance. • The architectural approach should demonstrate responsiveness to the site/local context, its history and the character. Locally distinctive stock brick should be the primary building material. • Provide a coherent sense of place, with a strong unified architectural character. • The community use and place of worship provides an opportunity for architectural interest and delight. • Maintain the openness of Rush Common, enhance the existing landscaping.

Site Allocation Policy	Proposed Site 21: 51–57 Effra Road SW2
Transport, movement and public realm	<p>Local Plan and London Plan transport policies will apply. These include, but are not limited to, London Plan Policy T5 relating to quantum and design of cycle parking, Policy T6 for maximum car parking standards, electric vehicle charging and Disabled Persons Parking requirement, and Policy T7 regarding Deliveries, servicing and construction, and Local Plan Policies T3 and Q13 on cycle parking, cycle hire membership and design, Policy T6 on car club membership and permit free developments, and Policy T7 regarding servicing on site.</p> <p>In addition, Local Plan Policy Q1 on inclusive environments and Policy Q6 on urban design in the public realm should be addressed.</p> <p>Additional vehicular crossovers over Rush Common will not be accepted. A narrowed vehicular access using the existing retail park entrance / egress could be used to access to the site. Parking in front of the Effra Road building line is strongly discouraged.</p> <p>Rush Common land should be used to provide an enhanced walking route that is fully publicly accessible and landscaped accordingly. Where vehicles must cross pavements along Effra Road, a pedestrian priority design will be expected.</p> <p>Vehicular traffic should not dominate the public realm within the site. This could include measures to slow cars through incorporation of a meandering route between landscaping features. Development access should not be gated.</p> <p>A suitable off-street servicing strategy for both the light industrial and residential uses should be demonstrated.</p> <p>Development should have a positive relationship to the street with defensible space, natural surveillance and clear entrances. Rear gardens and communal amenity space should not be publicly accessible.</p> <p>Landscaping should incorporate children and young people-friendly features such as play-on-the-way parallel playable routes.</p> <p>Planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network on Brixton Hill and Brixton Road.</p>
Community safety	<p>The building design must consider the need for any enhanced protective security measures that could increase community safety and prevent crime in light of Policy Q3 Safety, Crime Prevention and Counter Terrorism. The applicant must consider the perceived threat and vulnerability of a development based on its location and whether the site includes any crowded places or Publicly Accessible Locations (PALs). The applicant must liaise with Metropolitan Police Service (MPS) Counter Terrorism Security Advisers (CTSAs) early in the planning process to determine whether enhanced security measures are required. Design principles set out in Secured by Design should also be addressed early in the design process in discussion with MPS Crime Prevention Design Advisers.</p>
Fire safety	<p>Developments must achieve the highest standards of fire safety and comply with London Plan Policy D12 'Fire Safety' and Gateway 1 requirements (where relevant).</p>

Site Allocation Policy	Proposed Site 21: 51–57 Effra Road SW2
On-site residential amenity	<p>Residential accommodation should meet all relevant internal and external amenity standards and requirements as set out in London Plan and Local Plan policy and guidance.</p> <p>Rush Common land should not be relied upon to meet external amenity space standards for new housing.</p>
Neighbour relationships	<p>In accordance with Local Plan Policy Q2, the scheme should be designed to cause no unacceptable impacts on the amenity of existing neighbours adjacent to the site, including overlooking, loss of daylight, overshadowing and noise pollution.</p> <p>Particular regard should be paid to the relationship with sensitive residential neighbours on Dalberg Road and Fitch Court. New terraced housing to the rear of site should provide a better relationship with the gardens on Dalberg Road than the existing site layout.</p> <p>Applicants should test the relationship with potential optimum massing and demonstrate to the satisfaction of the local planning authority that acceptable neighbour relationships can be achieved, including in relation to daylight, sunlight, privacy, outlook and noise. As required by Lambeth Local Plan Policy Q7, applicants should demonstrate that development of the site does not prejudice the optimum future development of adjoining land. The Agent of Change principle will apply in accordance with London Plan Policy D13.</p>

Site Allocation Policy	Proposed Site 21: 51–57 Effra Road SW2
Flood risk mitigation	<p>Development must comply with London Plan Policy SI 12 and Local Plan Policy EN5.</p> <p>Part of the site is subject to considerable surface water flooding. A site-specific Flood Risk Assessment (FRA) will be required for any new development and must address the surface water flooding risk. To mitigate the risk of flooding the FRA should include and consider in order of preference:</p> <ul style="list-style-type: none"> • Analyse, assess, and understand the flood risk in detail to establish extents and depths of flooding across the development site, with an acceptable level of confidence. • Avoid the most vulnerable use types in locations at risk of flooding (e.g. Omit development in location identified as at risk of flooding). • Substitute land use types in accordance with the Environment Agency's Vulnerability Classification, through locating the most vulnerable use types to areas least likely to flood (e.g. locate residential properties above ground floor levels in at risk locations). • Mitigate the risk of flooding through a Flood Alleviation Scheme that manages the source(s) of flooding, but ensuring the risk of flooding elsewhere is not increased. Examples of measures include land and threshold raising, flood control measures, and surface water management measures. (Note: Surface water flood level reaches 16.685m AOD (0.384m deep). <p>In addition to the above, Sustainable Drainage Systems (SuDS) will be required as per the requirements of Local Plan Policy EN6. The discharge rate should be restricted as close as reasonably practicable to the greenfield rate. The use of blue or green roofs, and blue/green infrastructure in open spaces are ideal for this location to achieve this and should be considered.</p> <p>The approximate greenfield runoff rate is $Q_{Bar}=10.02$ l/s.</p> <p>Planning obligations may be sought towards a Flood Alleviation Scheme in the form of SuDS in the vicinity that will help to reduce the surface water flood risk to the site and neighbouring properties (located the other side of Effra Road within Council-owned land). This scheme may reduce the risk for the site sufficiently to allow residential properties to be located at ground floor.</p>
Groundwater and contaminated land	<p>Development must comply with Local Plan Policy EN4(f).</p> <p>Development should protect groundwater from contamination sources.</p> <p>Development should demonstrate consideration of risks associated with deep construction works, for example, in relation to groundwater and disturbing historic contamination and mitigate risks accordingly.</p>
Energy and sustainability	<p>Development should be exemplary in meeting the net zero carbon requirements of London Plan Policy SI2 as well as Local Plan Policy EN3 and Policy EN4. Every effort should be made to maximise the contribution towards achieving net zero emissions on site rather than through off-setting. London Plan policy and guidance on Whole Life-Cycle Carbon Assessments should be followed.</p>

Site Allocation Policy	Proposed Site 21: 51–57 Effra Road SW2
Waste management	Waste management and refuse and recycling storage are required to comply with Local Plan Policy EN7 and Policy Q12 . Refuse and recycling storage and servicing must be accommodated on site.
Air quality	Air quality should be addressed in accordance with London Plan Policy SI1 and Lambeth's Air Quality Action Plan .
Access to open space and nature conservation	<p>Rush Common open space should be retained and enhanced, including the removal of hardstanding and reinstatement of soft landscaping. Developers are strongly encouraged to develop landscaping plans in collaboration with Friends of Rush Common and other local stakeholders.</p> <p>In addition, development should address existing open space deficiency and access to nature deficiency by meeting the requirements of Local Plan Policy EN1(d).</p>
Biodiversity	Development should address biodiversity in accordance with Local Plan Policy EN1(c) . A Biodiversity Net Gain of at least 10% will be expected.
Urban greening and trees	<p>New development should optimise opportunities for street tree planting and new green infrastructure along Effra Road.</p> <p>Trees of value on Rush Common should not be negatively impacted or altered by the development.</p> <p>The Urban Greening Factor (UGF) target score is 0.4 for predominately residential schemes and 0.3 for predominately commercial schemes as set out in London Plan policy and guidance.</p>

From: Beth Lambourne [REDACTED]
Sent: 12 August 2024 15:51
To: SADPD
Cc: [REDACTED]
Subject: Submission of Representations - SADPD PSV - Pegasus Group obo Aquila Properties Ltd
Attachments: P22-2878 Cancell Road Regulation 19 Reps V2 - Final.pdf; SADPD_PSV_Reg 19 _Representation_Form - Pegasus obo Aquila.pdf

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Planning,

We are instructed to submit representations on behalf of Aquila Properties Limited, in respect of the Council's consultation on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV). Accordingly, please find attached:

- Completed Representations Form; and
- Representations Report (ref. P22-2878 V2).

We would be grateful if you could respond to confirm receipt.

Please let us know if you have any queries or require any further information.

Kind regards,

Beth

Beth Lambourne

Principal Planner

E [REDACTED]
M [REDACTED]

4 The Courtyard | Lockington | Derby | DE74 2SL

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Representations for Regulation 19 Site Allocations Development Plan Document Proposed Submission Version Consultation.

Land at Cancell Road, London, SW9 6EB.

On behalf of Aquila Properties Ltd.

Date: 7 August 2024 | Pegasus Ref: P22-2878

Author: HC / BL



Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	August 2024	BL	HC	Internal review and client comments
V2	August 2023	BL	HC	

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1. Introduction

- 1.1. Pegasus Group are instructed by Aquila Properties Ltd (hereafter referred to as Aquila Properties) to make representations to the London Borough of Lambeth's Regulation 19 consultation on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV).
- 1.2. Aquila Properties welcome the production of the Site Allocations Development Plan Document and wish to support the London Borough of Lambeth. The main issue that Aquila Properties have with the Plan is the lack of sufficient allocations for residential development and a concern that the Council's current approach to allocating residential development does not ensure the required provision of residential development.
- 1.3. The identification and allocation of additional residential sites is necessary to ensure the Plan is sound and to ensure that there is a suitable supply of deliverable and developable sites across the plan period.
- 1.4. There is a real possibility that the London Borough of Lambeth will need to identify further allocations to deliver the housing needs identified. This assessed need for the Borough is also likely to increase as a result of the proposed alterations to the standard methodology for housing provision. There is therefore an even greater and amplified need to identify and allocate additional sites for residential uses.
- 1.5. Another aim of this representation is to seek to have the site at Cancell Road identified as a formal residential allocation.

Aquila Properties

Aquila Properties forms part of the Excel Portfolios group, with significant interests in the private housing, care and supported living sectors. They have an extensive portfolio and are proud to work in partnership with a number of local authorities, Health and Community initiatives throughout London and the south of England.

Representation Report Structure

- 1.6. The structure of this representation is as follows:
 - **Section 2:** Sets out the site and surrounding area;
 - **Section 3:** Sets out the legal and procedural requirements in respect of the local plan process;
 - **Section 4:** Provides an overview and summary of the currently proposed Site Allocations;
 - **Section 5:** Addresses the housing policies and housing need; and
 - **Section 6:** Concludes the representation.

2. The Site and Surroundings

- 2.1. This representation relates to land at Cancell Road, SW9 6EB, which comprises the parcel of land which previously comprised the Patmos Lodge Care Home and is located generally within the built up urban area within Lambeth. Following the demolition of Patmos Lodge in 2014, the site has remained vacant and constitutes “previously developed land”.
- 2.2. The site is approximately 0.2 hectares (0.4 acres) and the Figure below shows the location of the site with an indicative red line boundary.



Figure 1 – Location of Site with indicative red line boundary

- 2.3. The site is bound by Cancell Road to the north, beyond which lies 2no. storey dwellings. To the east and south, the site is bound by Elliot Road, beyond which lies flatted development up to 4no. storeys. The flatted development to the south fronts on to Cromwell Road and includes retail units at ground floor. The area immediately west of the site has planning permission for the erection of 3no. separate residential blocks comprising 2no. four storey blocks and 5no. two storey houses to provide 31no. residential units which was granted on 21st July 2020 under ref. 20/O1265/RG3 (26no. flats and 5no. town houses). Construction has begun for the adjacent development. Christ Church Primary School is located to the west of the site, beyond the immediately adjacent residential development.
- 2.4. There are no trees subject to a Tree Preservation Order within or adjacent to the site.
- 2.5. There are no Statutory Listed Buildings or Locally Listed Buildings within the site. The closest Listed Buildings comprise: 6, 8, 10 Cancell Road (Grade II) approximately 150m west; 82 Vassell Road (Grade II) approximately 100m north; 64–80 Vassell Road (Grade II) approximately 130m north west. There are further Listed Building within the surrounding

area, particularly along Vassell Road and Camberwell New Road, as shown within the Figure below:

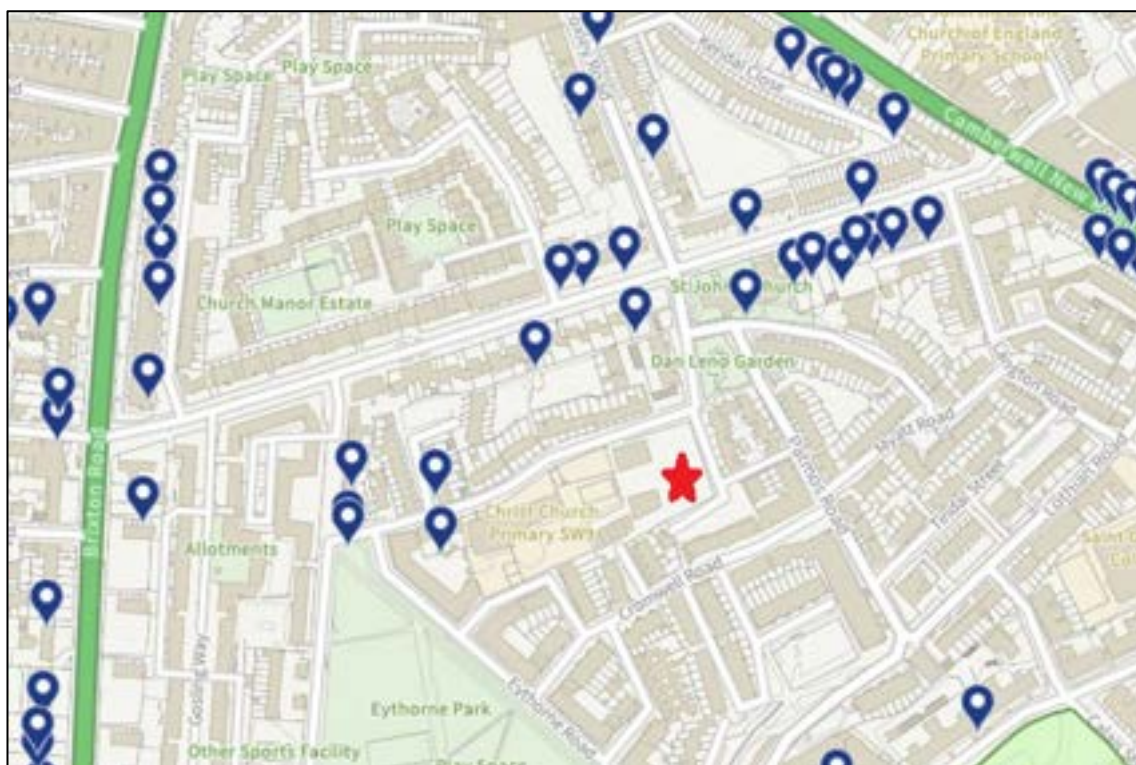


Figure 2 – Extract of Historic England online map with site indicated

- 2.6. Myatt's Fields, a Registered Park and Garden (Grade II) is located approximately 350m south of the site. Kennington Park, another Registered Park and Garden (Grade II), is located approximately 540m to the north east.
- 2.7. The site is not within a Conservation Area, but it is directly adjacent to the southern boundary of the Vassall Road Conservation Area. Extract of the Council's Conservation Area map for Vassall Road (ref. CA 7) included in the Figure below:

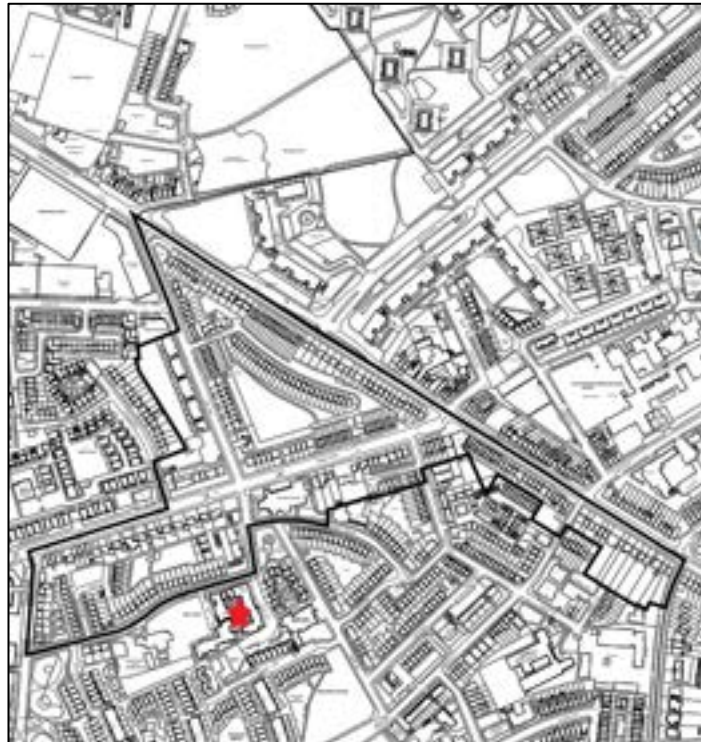


Figure 3 - Extract of Council's Vassall Road Conservation Area with the site indicated

- 2.8. According to the Environment Agency's online flood mapping, the site falls wholly within Flood Zone 1 which has the lowest probability of flooding.
- 2.9. The site has a PTAL rating of 4 indicating good access to public transport.

3. National Policy and Guidance

- 3.1. The National Planning Policy Framework (NPPF) (2023) sets out the Government's planning policies for England and how these should be applied. The NPPF sets out that it provides a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner, and that preparing and maintaining up-to-date plans should be seen as a priority in meeting this objective.
- 3.2. In respect of examining plans, Paragraph 35 states:
- "Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:*
- a) **Positively prepared** – Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 - b) **Justified** – An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 - c) **Effective** – Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 - d) **Consistent with national policy** – Enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*
- 3.3. Footnote 19 which relates to the objectively assessed needs sets out that where this relates to housing, *"such needs should be assessed using a clear and justified method, as set out in Paragraph 61"* [of the NPPF].
- 3.4. It is noted that there a consultation on the proposed amendments to the NPPF was published on 30th July for eight weeks until 24th September 2024, and forms a material consideration. Whilst the proposed amendments do not include any amendments to Paragraph 35, aside from an update to the number to Paragraph 36 (and no proposed amendments to associated Footnote 19), the consultation version does include amendments to Paragraph 61, and the wider Housing Chapter.
- 3.5. The proposed amendments set out a clear emphasis on meeting identified housing needs, and notably, includes a consultation on reforms to the standard method based on housing stock, affordability and local need. Housing targets are also proposed to become mandatory, with all Local Authorities needing to demonstrate that they have taken all possible steps (including optimising density, sharing need with neighbouring authorities, reviewing green belt boundaries) before a lower housing requirement figure can be considered.
- 3.6. As set out in the Outcome of the Proposed Revised Method Calculations, issued as part of the consultation, under the current method, the London Borough of Lambeth has an

assessed need of 2,231 dwellings over the plan period which will increase to 3,041 dwellings under the proposed standard method. This represents a required average annual net addition (for 2020/21–2022/23) of 755 dwellings.

Letter from Deputy Prime Minister to Local Authorities

- 3.7. The Deputy Prime Minister, Angela Rayner, has written to all local authority Leaders in England regarding the Government's plan to build the homes to country needs. In this letter the Deputy Prime Minister set out a strong belief in the plan making system, supporting that it is the right way to plan for growth, noting that *"Once in place, and kept up to date, local plans provide the stability and certainty that local people and developers want to see out planning system deliver"*.
- 3.8. Specifically in respect of plans that are at an advanced stage of preparation (Regulation 19), the letter states *"it means allowing them to continue to examination unless there is a significant gap between the plan and the new local housing need figure, in which case we propose to ask authorities to rework their plans to take account of the higher figure"*. Further, the letter states that *"I want to be clear that local authorities will be **expected to make every effort to allocate land in line with their housing need as per the standard method**"* [their emphasis].

4. Proposed Site Allocations

4.1. The Lambeth Site Allocations Development Plan (Proposed Submission Version) sets out the proposed changes to Lambeth's adopted Local Plan Policies Map 2021. This includes:

- Proposed changes of 3no. existing site allocations; and
- Provision of 10no. new site allocations.

4.2. Of the 13 sites that are the subject of the SADPD PSV, 11 include an element of potential residential units (set out in number order within the Plan):

Table 1 – Summary of Sites with Residential Uses Proposed a part of Draft Allocation

Site	Site Address	Proposed Land Uses	Comments
Site 1	Royal Street, SE1	129 self-contained residential; units to replace the existing quantum of homes on the site Office floorspace Flexible active ground floor uses Cultural facilities and community spaces	Residential units proposed to replace existing, no additional quantum of units proposed
Site 8	110 Stamford Street, SE1	Approximately 30 self-contained residential units Community / office floorspace at ground floor	
Site 9	Gabriel's Wharf and Princes Wharf, Upper Ground, SE1	Mixed-use redevelopment Ground floor active frontage with cultural uses Upper level offices / workspace and self-contained residential units Element of extra care housing where need is demonstrated	
Site 17	330–336 Brixton Road, SW9	Mixed-use redevelopment Replacement office and community floorspace At least 1,289sqm GIA light industrial workspace (to achieve no net loss of existing) Approximately 60–70 self-contained residential units with the quantum depending on the relative proportions of other uses on the site	Predominantly a redevelopment scheme to provide office and light industrial uses, with residential (up to 70) if this can be accommodated Likely to be affected by multiple land ownerships within the site and the need to bring forward a comprehensive masterplan

20	Tesco, 13 Acre Lane, SE2	Replacement supermarket with residential (approximately 180-210 self-contained residential units)	
21	51-57 Effra Road, SW2	Mixed-use redevelopment Approximately 85-95 self-contained residential units Flexible, light industrial workspace	
3	35-37 and Car Park Leigham Court Road, SW16	Mixed-use redevelopment Approximately 20-30 self-contained residential units	
18	300-346 Norwood Road, SE27	Approximately 150-170 self-contained residential units 3,000-4,000 sqm GIA of commercial/community floorspace, to include at least 1,231 sqm GIA light industrial workspace (to achieve no net loss of existing industrial floorspace capacity) Class E / Class F1 or F2 in town centre location Retail uses to be retained along primary shopping area	Quantum relates to the entire site allocation area, however potential that only some parcels of land within the allocated site will come forward given multiple land ownerships
7	6-12 Kennington Land and Wooden Spoon House, 5 Dugard Way, SE11	Mixed-use redevelopment At least 2,200 sqm GIA light industrial (to achieve no net loss of existing industrial floorspace capacity) Approximately 115 to 125 self-contained residential units Replacement of community use The above quantum subject to existing NHS facilities being re-provided elsewhere	Two separate land ownerships would likely mean two phases which will need to contribute to deliver overall vision for the site Provision of quantum of proposed uses relies on NHS facilities at Wooden Spoon House to be re-provided elsewhere and not re-provided within the site
22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street, SE24	At least 1,500 sqm GIA light industrial workspace Approximately 50-70 self-contained residential units	Allocation states industrial uses should be completed in advance of occupation of new residential accommodation on the site

23	Land at corner of Coldharbour Lane and Herne Hill Road, SE24	<p>Replacement community uses with active frontage at ground floor</p> <p>Alternatively, flexible town centre uses (Class E)</p> <p>Approximately 30–40 self-contained residential units on upper floors</p> <p>Flexible and creative workspace</p>	Allocation states industrial uses should be completed in advance of occupation of new residential accommodation on the site
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- 4.3. It is clear that for a number of these sites, there is the potential for the approximate residential units to not to forward to its full capacity. The approximate total of residential units set out above, using the maximum quantum, comprises circa 1,000 units. Whilst this will assist with the Council meeting its assessed need, it is necessary to allocate further sites to ensure that their need can be met. This is of additional importance given the potential that the Council's housing need will increase as a result of the proposed changes to the standard method, as set out within the NPPF consultation.
- 4.4. Further, it has been made clear by the Deputy Prime Minister that Local Authorities are expected to amend their plans to allocate sufficient residential development to meet the new standard methodology. As currently set out, as the Council is not intending to allocate specific residential sites, this is an ineffective and unjustified approach to Plan making, and Aquila Properties are concerned that the Council will not be able to meet their updated annual requirement of 3,041 units, which represents an additional average of 755 dwellings per annum. The latest Lambeth Housing Development Pipeline Report (2021/22) sets out that net additional dwellings completed in 2021/22 were 714, which would have to be significantly increased to meet the proposed housing targets set by the current Labour Government.
- 4.5. In addition, the Pipeline Report (2021/22) sets out that the Council believe they can demonstrate **5.09 year supply**. It is clear that given the increase required, this marginal increase over the 5 year housing land supply requirement is likely to result in the Council not being able to meet their required need.
- 4.6. Furthermore, there is also potential that the sites will not come forward within the next five years, or indeed the plan period, given the complexities of site ownership and the need for the sites to come forward in 'phases' or as part of an agreed site-wide masterplan. This further exacerbates the need to allocate additional sites that can bring forward residential units.
- 4.7. In addition, none of the sites proposed comprise solely residential development; all of the sites listed within the SADPD PSV relate to mixed-use redevelopment. This is likely to affect the quantum of residential units that can come forward overall, as the residential element may be affected by the other priority uses for the site allocations, such as light industrial uses.
- 4.8. It is understood that the Council have taken the approach of only including sites within the SADPD PSV where it has been considered necessary to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies. In addition, the Council have set out that there is no need for Lambeth to allocate

sites to demonstrate the borough's ability to meet its London Plan housing target, on the basis that this was achieved through the examination of the Lambeth Local Plan which took place in 2021.

4.9. Whilst it is understood that the Council were confirmed to have a five year housing land supply as part of the Inspector's Report issued to the Lambeth Local Plan in July 2021, Aquila Properties disagrees with this approach for the reasons set out above, and recommends that the Council need to revise this approach to ensure sufficient residential development is brought forward within the plan period. This is of particular importance given that in accordance with the NPPF, the identified housing requirement is a minimum figure which the Local Plan should seek to surpass.

4.10. The NPPF requires plans to be positively prepared and to 'significantly boost' the supply of housing. As such, the Council should be seeking to surpass their needs and Aquila Properties recommends that the Council looks to include residential specific sites within the SADPD, and to include the land at Cancell Road which is the subject of these representations.

4.11. Aquila Properties are keen to ensure that the Council produces a plan which can deliver against its housing requirement. The Plan therefore need to allocate more sites for residential development.

4.12. It has been clearly set out that the land at Cancell Road is suitable, available, and achievable; therefore, ultimately deliverable. The Council should acknowledge that the site is deliverable and should allocate this site for residential purposes on this basis.

5. Site Capacity and Deliverability

- 5.1. This section provides an overview of the potential capacity of the site and the site's deliverability.

Site Capacity

- 5.2. Aquila Properties have previously sought pre-application advice from the Council in relation to the residential development of this site (request submitted March 2023 with written response issued in August 2023). The principle of development was agreed as part of the written response, with the Council having concerns with respect of the proposed height and massing, which comprised 6no. storeys and 63no. residential units (Class C3).
- 5.3. Aquila Properties are committed to bringing forward the site for residential purposes, however this may not be traditional C3 dwelling units, as Aquilla Properties are considering other residential typologies, such as co-living, student, retirement living, or care provision, all of which contribute to the supply of housing¹.
- 5.4. These representations have been submitted with the following plans which show an indicative layout which could be brought forward to accommodate residential development at this site:
- Site Block Plan (ref. 22.0111 SK010) (**Appendix 1**)
 - Indicative Proposed Building Footprint (ref. 22.0111 SK100) (**Appendix 2**)
- 5.5. These are indicative layouts, which demonstrate that the site has the potential to bring forward circa 6,500 sqm of residential floorspace (based on circa 1,300sqm per floor over 5no. storeys). The plans have been set out to demonstrate a scenario where this quantum of residential floorspace could be brought forward on site at 5no. storeys, which is a reduction from the 6no. storeys proposed during the pre-application stage to respond to Council's comments. The site could be capable of providing additional floorspace above this threshold, subject to detailed design.

Site Deliverability

- 5.6. This section has set out the site, its characteristics, and the surrounding area. The site is available, suitable, achievable and therefore ultimately deliverable in accordance with the definition set out within the National Planning Policy Framework (NPPF) (2023) which is described as the following within the Glossary:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."

¹ Notably, the London Plan Guidance in respect of Large-Scale Purpose-Built Shared Living (February 2024) acknowledges that co-living type development should count towards housing supply on a ratio of 1.8:1 basis as per London Plan Policy H1 (Increasing Housing Supply) paragraph 4.1.9

5.7. The site is deliverable, given the following:

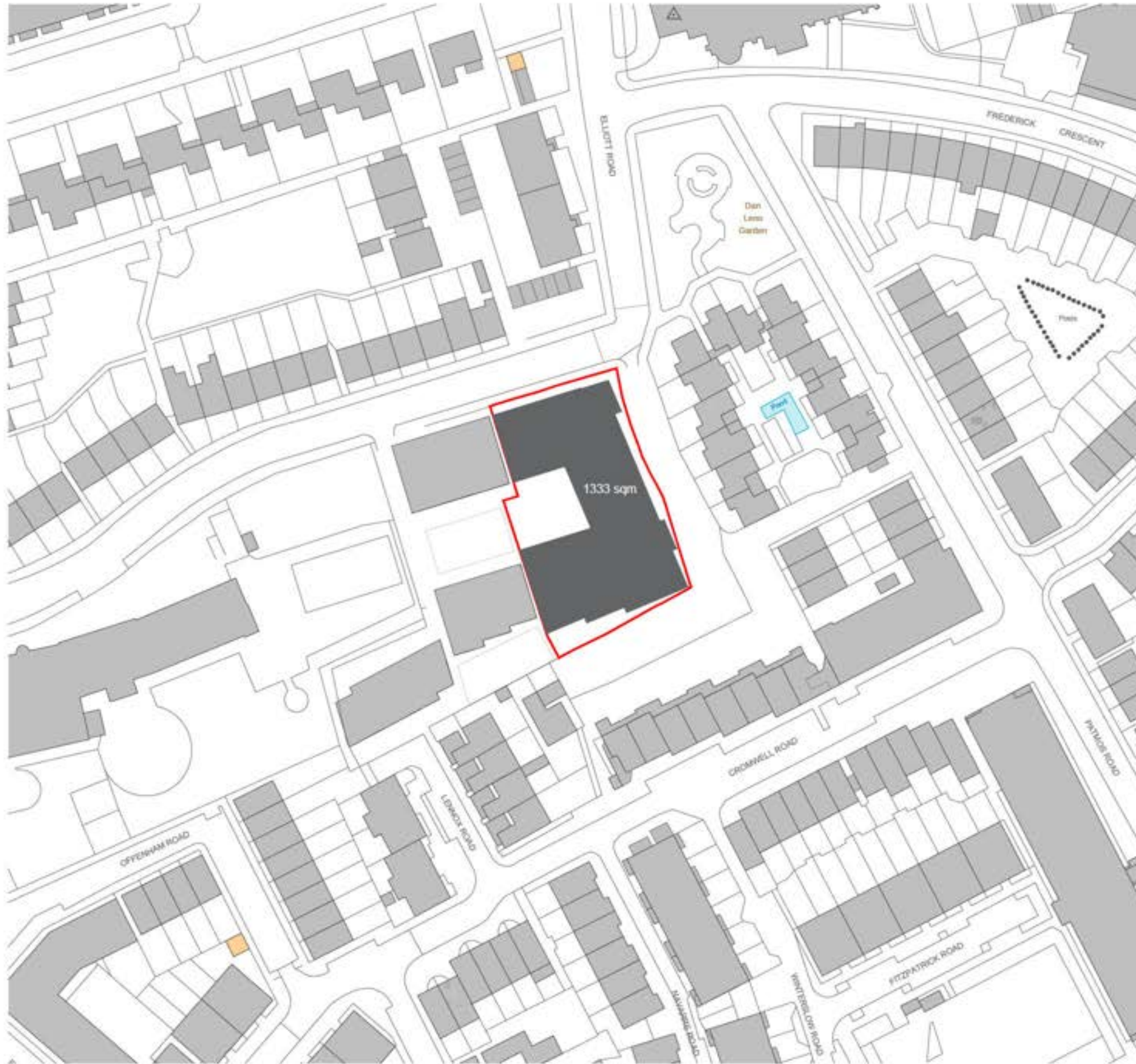
- **Suitable:** The site is located within an urban area and comprises previously developed land, within a wider residential context. The site is accessible, and has no physical constraints which would preclude the use of the site for residential uses.
- **Available:** The site is available for development now, with Aquila Properties aspirations to bring forward the site for residential development to be retained within their portfolio. This has been demonstrated with the recent submission of pre-application advice, with further engagement with the LPA anticipated in Autumn 2024.
- **Achievable:** Aquila Properties are committed to bring forward a viable residential development in this location within the next five years. Aquila Properties intend to retain and manage the site themselves, and anticipate a 18–24 month construction period following the granting of any future planning permission.

5.8. Accordingly, the site should be accepted by the council as suitable, available, achievable, and ultimately deliverable, and therefore allocated for residential development.

6. Conclusion

- 6.1. Overall, Aquila Properties support the Council in bringing forward the SADPD, and in working to meet their identified housing requirements.
- 6.2. Aquila Properties has set out that the land at Cancell Road is a suitable, available, and achievable. The site is therefore a clearly deliverable site, which has the capability to be delivered within the next five years and therefore to contribute to the Council's housing need within the plan period.
- 6.3. The Council are therefore requested to include land at Cancell Road as a allocation for residential development.
- 6.4. Aquila Properties welcomes further engagement with the London Borough of Lambeth in respect of this site.

APPENDIX 1 – SITE BLOCK PLAN



Hollaway

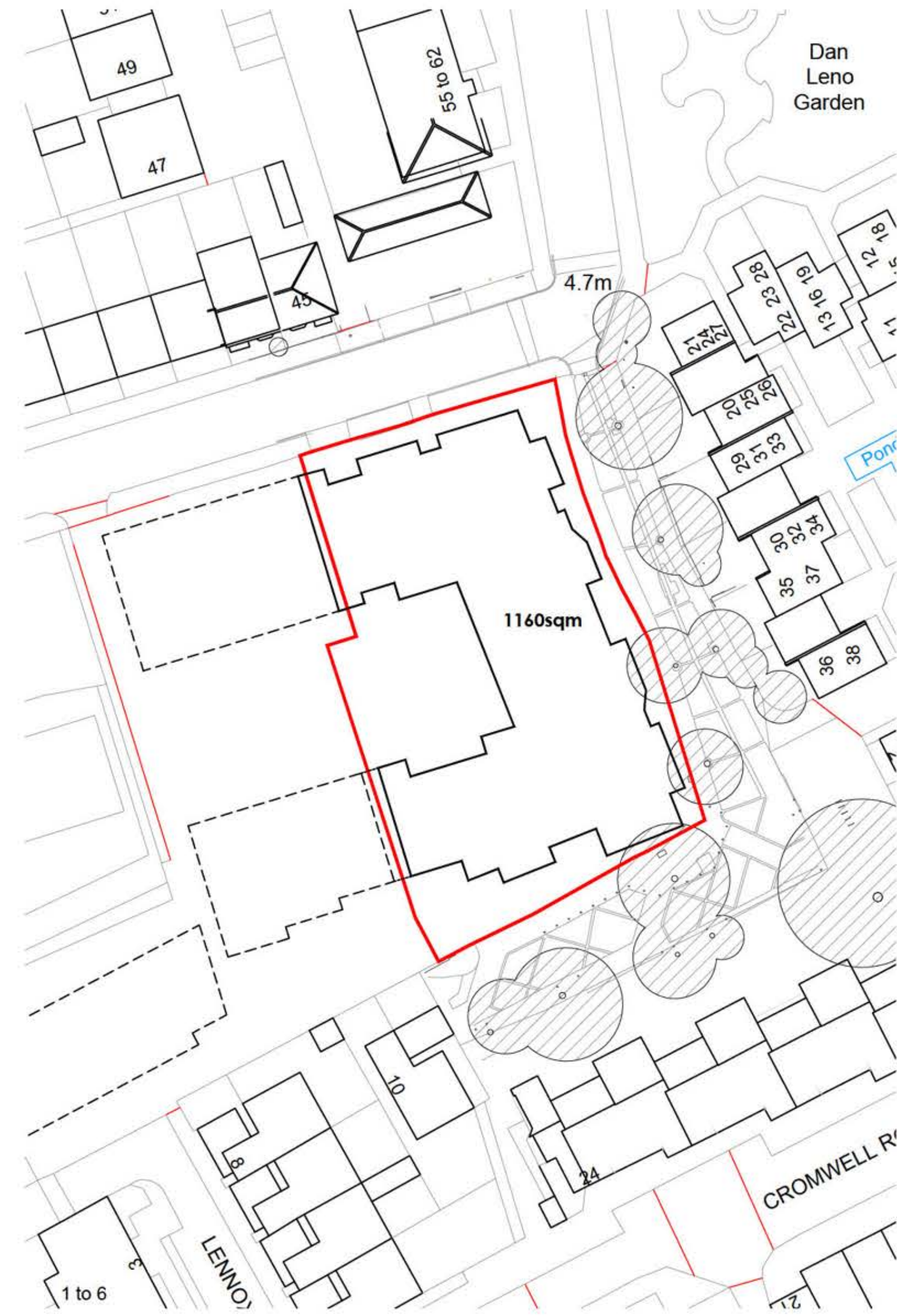
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 Date: 08/08/2024
 Scale: 1:1000
 Project: 22.0111

Project: 22.0111
 Client: Hollaway
 Title: Preliminary
 Status: Preliminary

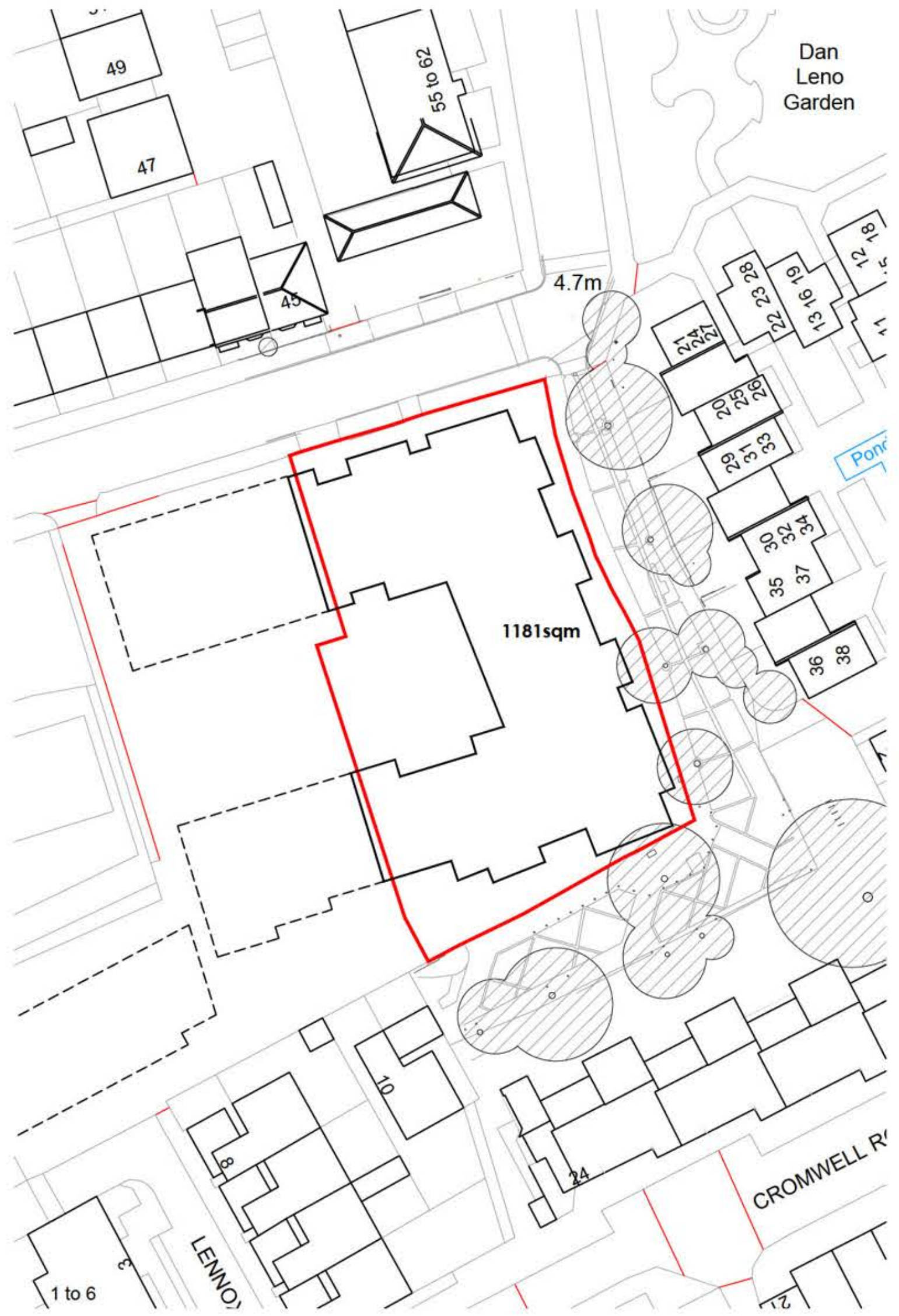
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 Date: 08/08/2024
 Project: 22.0111

Project: 22.0111
 Drawing: SK010

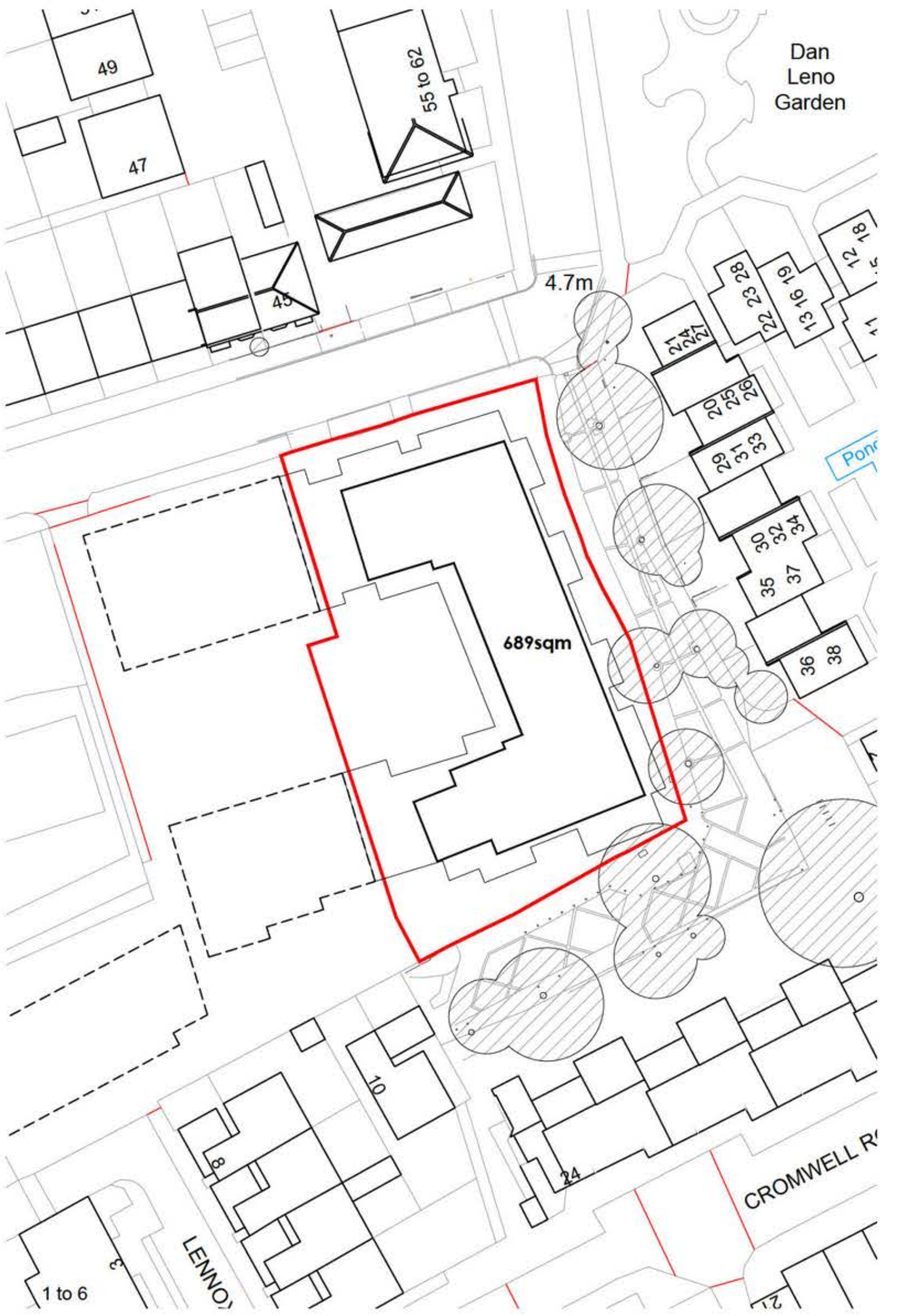
APPENDIX 2 – INDICATIVE PROPOSED BUILDING FOOTPRINT



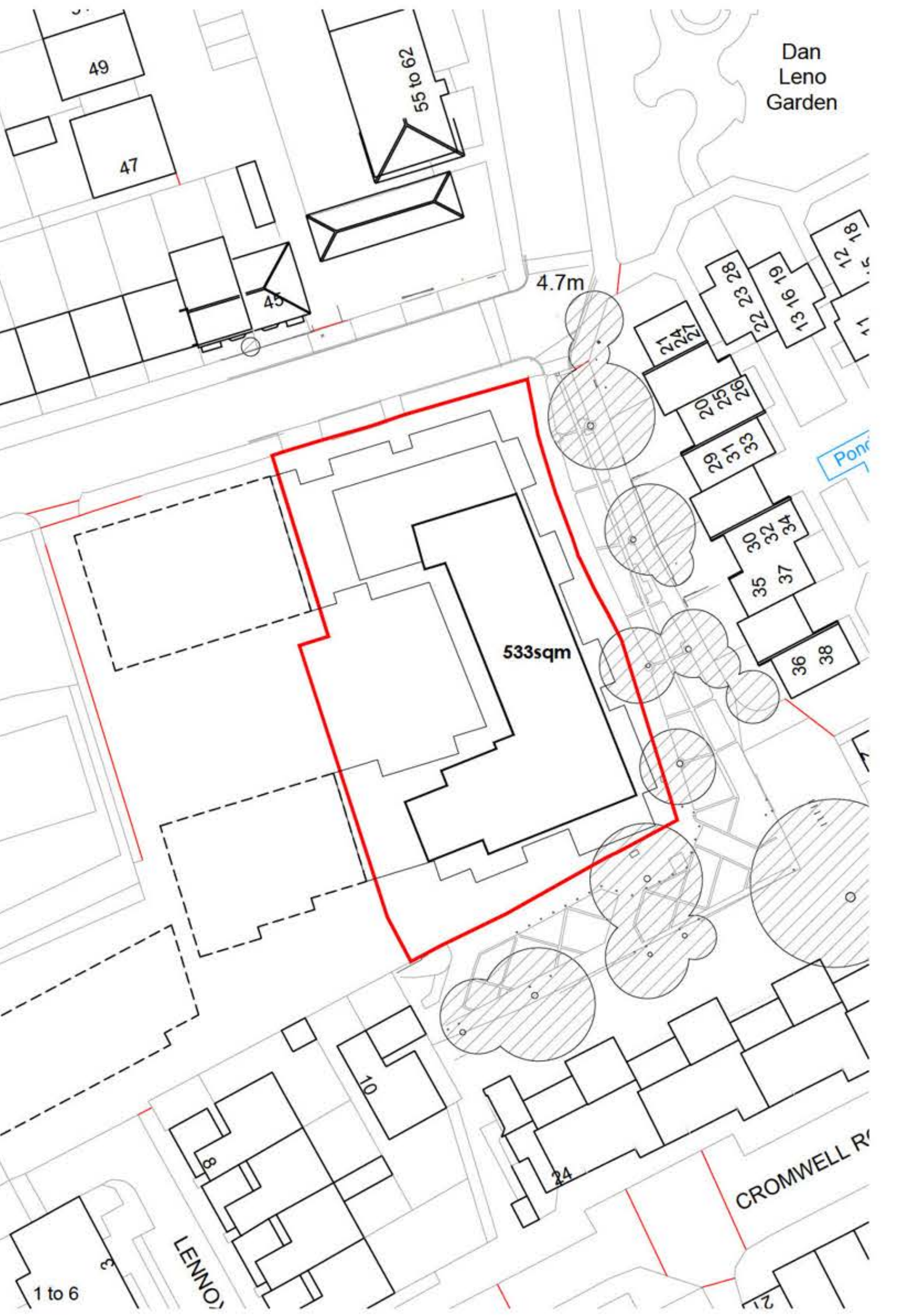
PROPOSED GROUND FLOOR PLAN



PROPOSED TYPICAL 1ST, 2ND & 3RD FLOOR PLAN

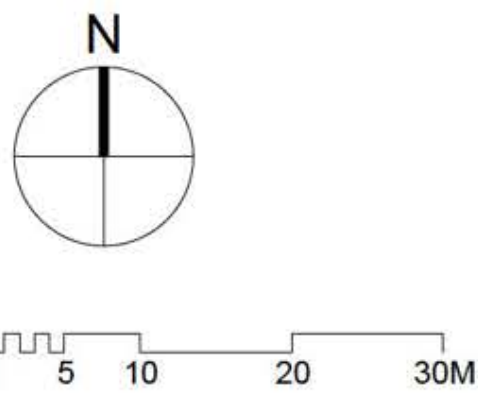


PROPOSED 4TH FLOOR PLAN



PROPOSED 5TH FLOOR PLAN

TOTAL GEA FOR GROUND + 5 STOREY PROPOSAL - **5,925SQM**



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Project | Cancell Road
Oval
Client | Guildmore
Title | Proposed Plans / building footprint
Status | #####

Scale @ A1 | 1:500 Date | JULY 2023 Drawn | AA Chk'd | TG

Project Number Drawing Number Revision
22.0111 SK100 #####
Bim Number: #####-GHA-##-##-OR-A-####-##-####

####

Town & Country Planning Act 1990 (as amended)
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To whom it may concern,

Please find attached our representations for the above-mentioned consultation on behalf of Guy's and St Thomas' NHS Trust.

Please confirm receipt of this email and its attachment at your earliest opportunity.

Kind regards,



Holly Ganderton
Senior Planner
BA (Hons) MSc MRTPI
Pronouns: [REDACTED]

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Planning Policy Team
London Borough of Lambeth
Lambeth Civic Centre
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SW12 1EG

Our Ref: 2024UK261958
12 August 2024
CONFIDENTIAL

Dear Sir/Madam,

Lambeth Regulation 19 Site Allocations Development Plan Document Proposed Submission Version – Response from the Guy’s and St Thomas’ NHS Trust

Introduction

WSP’s Heritage Planning and Placemaking team write on behalf of our client, the Guy’s and St Thomas’ NHS Trust (referred to hereafter as the Trust), in response to the re-opening of the Regulation 19 consultation on the *Site Allocations Development Plan Document Proposed Submission Version* (SADPD PSV), produced by the London Borough of Lambeth Council (referred to hereafter as the Council). Our team have Historic Environment Service Provider Recognition (HESPR) from the Institute of Historic Building Conservation (IHBC), and members of the team are RTPI and IHBC accredited. We have extensive experience of working in central London in relation to heritage assets of the highest significance including, sites in the Westminster World Heritage Site, Historic Royal Palaces, and other Grade I and II* listed buildings. As a result, our team is well-placed to make representations in relation to the St Thomas’ Hospital site.

Proposed Site 2 – St Thomas’ Hospital SE1

The Trust is an important landowner, healthcare operator, research and learning institution and major employer in the Borough and occupies the following site within the SADPD PSV: Proposed Site 2 – St Thomas’ Hospital SE1. It is one of the highest profile sites within the UK, occupying a very prominent location along the River Thames opposite the Palace of Westminster. Some of the development on the site is of poor quality and has a negative impact on the surrounding townscape and setting of heritage assets of the highest possible significance. Over the plan period there may be an opportunity for significant investment in this site and the opportunity to create a truly world class hospital campus. If approached correctly, potential changes could significantly improve the quality of development on the site and enhance the surrounding townscape and setting of neighbouring heritage assets.

Previous Representations

WSP has previously provided representations in relation to Site 2 – St Thomas’ Hospital SE1, with the Trust being largely supportive of Site 2’s inclusion in the SADPD PSV. It particularly welcomed the recognition of the site’s potential to contribute to the MedTech cluster (as established by the

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vision for Waterloo and South Bank in Policy PN1 of the Lambeth Local Plan), and supported the role of the site in its potential to deliver enhanced clinical care, ancillary uses to the hospital such as workspace, and flexibility for relocation of the Florence Nightingale Museum, which align with the future aspirations for the site. However, the Trust objects to the recent addition of arbitrary restrictions on the height and the extent of development that are not based on a full understanding of the site and its context. Rather than applying crude, quantitative criteria to the future development of the allocation site, we strongly suggest a qualitative approach that is based on a thorough understanding of the site and its surrounding, with the site's opportunities fully realised through a comprehensive masterplan approach guided by design and development performance criteria.

Heritage and Townscape Context

We recognise the importance of the historic environment of the site and its surrounding context, with heritage assets of the highest possible significance being within close proximity of the site. The site falls within the Albert Embankment Conservation Area and is adjacent to the Lambeth Palace Conservation Area. Within the site there are listed buildings, including statues listed at Grades I and II*. There are also listed buildings within very close proximity of the site, including the Main Block of the County Hall and Westminster Bridge, which are Grade II* listed. The Lambeth Palace Registered Park and Garden stands on the opposite side of Lambeth Palace Road, containing the Grade I listed Lambeth Palace. Opposite the site, on the other side of the River Thames, are numerous heritage assets, including the Palace of Westminster, which is Grade I listed, and the Palace of Westminster, Westminster Abbey and St Margaret's Church World Heritage Site.

We also recognise that the site occupies a very prominent location along the River Thames and is visible in views designated by the London Plan, especially broad prospects along the River Thames ('River Prospects'), including upstream views from Westminster Bridge; downstream views from Lambeth Bridge; and views from the Victoria Embankment between Waterloo and Westminster Bridges looking east. The site is also visible in more local views, especially from the Albert Embankment; Westminster Bridge Road; and Lambeth Palace Road. The site is particularly dominant in views from Westminster Bridge looking east.

Whilst there are heritage assets of the highest significance within and surrounding the site and the site is visible in designated views, the buildings associated with the post-war redevelopment of St Thomas' Hospital have a negative impact on: the character and appearance of the conservation area in which they sit; the setting of surrounding heritage assets; designated views; and the quality of the townscape along the edges of the site (including along Westminster Bridge Road, Lambeth Palace Road and the Albert Embankment). This is particularly true of the buildings constructed in the 1960s and 1970s, such as the large North Wing and Gassiot House completed in 1975, which have a modernist style and are externally clad in white ceramic tiles. They fail to relate to their surroundings in terms of architectural style, form, massing and materials. For example, the modernist buildings on the site, with their strong horizontal emphasis, appear alien in the context of heritage assets with a strong vertical emphasis, which is exemplified by the towers and spires of the Palace of Westminster.

There are significant opportunities to enhance the character and appearance of the site, improve the settings of surrounding heritage assets and to create a higher quality townscape context. However, very specific and overly prescriptive restrictions will not help to achieve this.

Vision for Proposed Site 2 (as set out in the SADPD)

The site allocation has been based on an indicative vision map (set out on page 31 of the SADPD PSV). This vision map has not been submitted by the Trust nor does it represent the full extent of the future placemaking opportunities for the site. It includes an unhelpful mixture of indicative parameters (e.g. the location for potential/enhanced pedestrian connectivity) and definitive parameters (e.g. maximum building heights). Design and development criteria should instead be the result of a comprehensive masterplanning exercise that encourages creative approaches to achieving the Trust's vision for the site, rather than an indicative vision map that is based upon a limited evidence base. Whilst it is appreciated that the vision map is intended to be indicative and guide future development, it contains unduly prescriptive parameters that could be significant constraints for any future planning application on the site once the SADPA has been adopted.

The Trust objects to the design approach being applied, including the recent additions seeking to restrict the height and the extent of development. It does not support the following wording, which is unduly restrictive:

“The site is not within a location identified as appropriate for tall buildings, defined as above 45m in this location. The heights on the vision map are dictated by sensitivity in relation to the settings of the Westminster World Heritage Site and County Hall in views from the west. The 31m maximum height seeks to ensure that the ‘sky gap’ along the edge of the Elizabeth Tower is preserved in Strategic View 27B. Applicants should be mindful of these considerations when developing detailed schemes.”

We suggest that appropriate heights are sufficiently guided by other policies within the SADPA PSV and the London Plan.

The indicative vision map identifies three maximum building heights 31m, 40m and 44m AOD, associated with two broad blocks (Locations A and B). This crude approach to maximum building heights does not take into account that some areas of the site are less sensitive than others (e.g. in terms of their intervisibility with heritage assets and the degree to which they feature within designated views). As indicated by the indicative vision map, the north-east corner of the site is adjacent to buildings with heights greater than those indicated for the proposed allocation (the Park Plaza Hotel is 49m in height and 199-203 Westminster Bridge Road is 63m in height). The SADPA PSV is overly focused upon restricting the height of buildings rather than promoting a comprehensive masterplan approach and the creation of high-quality buildings that respond to their context.

Comprehensive Masterplan Approach

A comprehensive masterplan approach is needed to deliver the proper planning of the site, including better pedestrian connectivity within and from the site (e.g. access to the river frontage); a more inspiring townscape fronting the River Thames – respecting designated views and the setting of heritage assets of the highest significance; and to create a more inspiring form of development upon this site of national significance. This approach should include a thorough understanding of the site, its context and the Trust's vision for the site. Potential future opportunities on the site need to be maximised and approached in a holistic way with placemaking at the heart of the development process. Achieving appropriate building heights and the right amount of development on the site will be important, but these should be borne out of a more detailed analysis of the site (including the modelling of visual effects), rather than quantitative

parameters, such as maximum building heights, being a key driver from the outset. Design and development performance criteria, which balances a range of design and development objectives, would be more appropriate. From a conservation and townscape perspective, criteria should achieve, amongst other things:

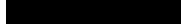
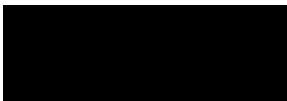
- An improved network of spaces within the site for patients, related to healing and well-being, and for visitors and those working within the hospital;
- Improved pedestrian connectivity within the site and between the site and its surroundings;
- An improved townscape along Lambeth Palace Road, which currently comprises a confusing arrangement of level changes, steps and ramps, large areas of car parking, areas of poor planting; and poor-quality boundary treatments with blind walls;
- An improved townscape along the Albert Embankment, with an enhanced frontage onto the River Thames; the existing frontage is characterised by confusing level changes, barriers to pedestrian movement, and a dominance of car parking;
- An improved setting for Westminster Bridge and the listed buildings along Westminster Bridge Road; and
- An improved relationship between the site and the opposite side of the River Thames with new development forming a more suitable composition with the Palace of Westminster.

Summary

In summary, whilst the Trust welcomes the inclusion of Site 2 – St Thomas' Hospital as a site allocation, it wishes to see the removal of the narrow focus upon restrictive height limits and the extent of development based upon a limited evidence base, and instead requests a comprehensive masterplanning approach that encourages a more creative approach to placemaking and achieving the best possible form of development upon this exceptional site of national significance.

The Trust is keen to work collaboratively with the Council on this and would welcome further discussion.

Yours faithfully,



BA Hons Bpl MA (Urb Des) MRTPI IHBC
Technical Director
Heritage Planning and Placemaking
Planning Consultancy

From: Ashleigh Bullough [REDACTED]
Sent: 13 August 2024 13:39
To: SADPD
Cc: [REDACTED]
Subject: Site Allocations Development Plan Document - Consultation Response - Earlswood Homes
Attachments: 240813_Earlswood Homes_Site 23 Representations.pdf; Reg-19 Form - Earlswood Homes - Site 23.pdf

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Dear Sir / Madam,

We are pleased to write to you today to submit representations on behalf of Earlswood Homes, in response to your ongoing Regulation 19 Site Allocations Document consultation.

We attach for your consideration a letter of representation as well as the completed Regulation 19 form.

We would be grateful if you could confirm receipt of this submission.

Please do not hesitate to get in touch if you have any questions.

Yours sincerely,

Ashleigh

Ashleigh Bullough MRTPI
Associate Director, Planning

telephone: [REDACTED]
mobile: [REDACTED]
email: [REDACTED]



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London Borough of Lambeth
Planning Policy and Place Shaping
P.O. Box 80771
London, SW2 9QQ

13th August 2024

VIA EMAIL

Dear Sir / Madam,

LONDON BOROUGH OF LAMBETH – DRAFT SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT: REPRESENTATIONS ON BEHALF OF EARLSWOOD HOMES LIMITED

On behalf of our client, Earlswood Homes Limited ('Earlswood Homes'), we hereby provide our comments on the London borough of Lambeth's Regulation 19 Draft Site Allocations Development Plan Document (DSADPD). In response to the consultation document, this letter of representation provides commentary on the draft site allocation for the Land at the corner of Coldharbour Lane and Herne Hill Road (Site 23).

a. Background – Earlswood Homes

Earlswood Homes is an award-winning, privately-owned and funded developer that focus on delivering high quality homes in desirable locations. Established in 2006, they deliver on average 100 dwellings per annum, with numerous residential-led developments London and the South East.

Earlswood Homes currently has 550 homes in the planning pipeline, as well as a 100% success rate on previous planning permission. Earlswood Homes have been active in Lambeth, with permission granted for the redevelopment of a site on the corner of Abbotswood Road and Hoadly Road, to provide 14 new high-quality homes. Earlswood Homes now have interest in the site located on the corner of Herne Hill Road, and look forward to working with the London Borough of Lambeth again to bring forward proposals for high-quality housing, alongside other compatible uses in this location.

b. The Site

Site Description

The Site comprises of Sureway International Christian Ministries and associated car park on Herne Hill Road, London, SE24 0AU. It is located on the corner of Herne Hill Road and Coldharbour Lane. At approx. 0.1 hectares in size, the Site comprises of the two-storey brick-built church building containing 1,058 sqm GIA of community floorspace.

The Site is bound to the west by the Loughborough Junction railway line. To the south is the old Higgs Industrial Estate, which is being redevelopment to provide a high-density residential-led scheme.

Due to the close proximity to Loughborough Junction Station, a number of local amenities are near to the Site, including restaurants, pharmacies, convenience stores, coffee shops, as well other places of worship.

Further, the Site is very well connected by public transport, with the nearby Loughborough Junction Station providing frequent connections to Blackfriars, Farringdon, as well as St Albans and Sutton. There are a number of bus stops along both Herne Hill Road and Coldharbour Lane, with frequent

connections to Brixton, Shoreditch and Peckham via Bus Routes P4, 345, 45, 35. The PTAL value for the Site is 4, however it should be noted that locations very near have a PTAL value of 5.

The Site is not adjacent to any Statutory or Locally listed buildings, with the nearest listed building being 56 & 58 Southwell Road approx. 280m away. This considered, the Site is near to Loughborough Park Conservation Area. A review of the Environment Agency's Flood Risk Map for Planning has found that the Site is located in Flood Zone 1 and as such has a low probability of flooding.

Planning Designations

The Lambeth Local Plan and Policies Map (2021) identifies the following planning designations relevant to the Site:

- Brixton Creative Enterprise Zone
- Loughborough Junction Local Town Centre

With these designations in mind, it is clear that the Council seeks to prioritise employment and commercial floorspace.

Planning History

The planning history of the Site is extensive, with a 2001 change of use application from general warehouse space (Use Class B2) to a place of worship (Use Class D1) (Ref: 01/02667/FUL) that was initially refused, and then won at appeal in 2002. Applications to create additional access and ancillary uses to the church (Ref: 03/00833/FUL) and for warehouse storage (Use Class B8) along the three railway arches (Ref: 05/03767/OUT) were both approved.

Notably, a 2015 application (ref: 15/01024/FUL) to refurbish and add three additional storeys to the structure (including ancillary B1 office floorspace and 5 flats of C3 residential) was approved, following a previous rejection of a similar application in 2014 with less cycle parking. Construction has not begun, implying a likely voiding of planning approval.

Immediately south of the site is the Higgs Yard development (planning ref: 18/05425/FUL), currently under construction for a mixed-use redevelopment with buildings ranging in height from 2 to 16 storeys with 134 residential units and 4,150 sqm of commercial/employment floorspace, with amenities, and associated car and cycle parking.

c. Policy Background

Lambeth Council's development plan consists of the following key policy documents:

- Lambeth Local Plan (2021); and
- London Plan (2021).

The Lambeth Local Plan sets out in **Policy H1 'Maximising housing growth'** that they aim to provide 1,335 homes per annum during the plan period, with this to be achieved through working with relevant partners to optimise the potential for housing delivery on all suitable and available brownfield sites, as well as optimise residential density.

The Brixton Creative Enterprise Zone (CEZ) requires designated sites to comply with the following Lambeth Local Plan (2021) policies:

- **Policy ED2 'Affordable workplace'** – states that developments proposing at least 1,000 sqm of office floorspace should provide 10% rentable floorspace (NIA) as affordable workspace for 25 years

- **Policy ED5 ‘Work-live development’** – states that work-live developments may be acceptable on Brixton CEZ land if it does not result in the loss of a site suitable for continued business use; and
- **Policy PN10 ‘Loughborough Junction’** – states that the Council will support proposals within Loughborough Junction Local Centre which improve the efficiency of land use, especially which improves amenity spaces, as well as proposals which support growth of creative and digital industries in the Brixton CEZ.

d. Comments on the Draft Allocation

The consultation on the DSADPD welcomes comments on all aspects of the document, including on site specific allocations. Earlswood Homes would like the opportunity to revisit site allocation No. 23, and are using this opportunity to submit formal comments.

Site 23 allocation outlines a number of considerations and requirements for the redevelopment of Site 23. The most pertinent aspects of the site allocation are set out below.

- Replace existing community use and provide an active frontage at street level
- New pedestrian route providing improved access to the railway arches
- Potential to provide flexible Use Class E floorspace at ground level, or alternatively flexible and creative workspace uses along Junction Yard adjacent to the railway arches since the Site falls within the Brixton CEZ
- Provide 30-40 self-contained residential units on upper floors, with potential for more depending on the mix and quantum of other community or town centre uses provided.

Earlswood Homes agrees that given the sustainable location of the Site, and its proximity to the Higgs Yard redevelopment, Site 23 presents an excellent redevelopment opportunity, and it would be well suited to the delivery of more homes. However, Earlswood Homes wish to provide formal comment on a number of potential amendments to the aforementioned draft allocation.

Increasing Housing Capacity

The Draft updated NPPF and Standard Method calculations were published on the 30th July 2024, in which the new Labour Government set out housing delivery requirements and key planning policy priorities.

Paragraph 122 (C) of the Draft NPPF outlines that there will be substantial weight given to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be regarded as acceptable in principle.

Further to this, the updated Standard Method replaces a focus on household projections to a flat 0.8% increase in housing stock per annum. All local authorities as a result will have adjusted Standard Method calculations, including Lambeth Council.

There are transitional arrangements in place which mean that Lambeth may not be required to amend previously calculated housing targets to reflect the new standard method. However, the figures from the Government’s new calculations show a new annual housing need target for Lambeth of 3,041 homes per annum. This is considerably higher than the current London Plan target of 1,335 homes per annum.

Lambeth may be able to proceed based on the current London Plan housing target, and therefore may be able to demonstrate a five-year housing land supply on this basis. This considered, we are aware that the Greater London Authority are currently carrying out a review of the London Plan, and this will consider the proposed changes to the NPPF and the standard method. As such, it is possible that

Lambeth may have an increased housing target to plan for in the near future. Furthermore, the new standard method proposed by the Labour Government shows the Government's commitment to increasing housing delivery, and most importantly, utilising brownfield land as a priority to do this.

As such, Earlswood Homes wants to encourage Lambeth Council to maximise the potential of brownfield land, and sites such as Site 23, are well placed to do this.

These points considered, sensitively increasing the density of a residential-led proposal on Site 23 would support Lambeth in meeting the housing delivery uplift resulting from the updated Standard Method. Earlswood Homes has carried out indicative testing and feels it would be possible to deliver a residential-led scheme of up to 50 homes on the Site. As such, Earlswood Homes would like to ask Lambeth to consider increasing the site capacity from 30-40 homes, to 40-50 homes.

Building Heights

In line with the changes being led by Government, it is clear that the delivery of housing is a priority, and using well-located, sustainable brownfield sites to deliver housing should be further prioritised. Given the incredibly sustainable location of the Site, immediately adjacent to Loughborough Junction station, and near the amenities and facilities of both Loughborough Junction and Brixton, it is considered that a more flexible approach to heights should also be considered in the site allocation.

Currently the draft site allocation sets out that heights of more than 30m would not be acceptable on the site. Whilst we understand it is important to set out some expectations for potential heights, we think the allocation could be softened slightly to allow for greater heights to come forward if it is exceptional design, and it can be shown through view testing and heritage assessments that the proposals would have a positive impact on the local area.

Ground floor uses

Earlswood Homes have been exploring redevelopment options for the Site and in the spirit of delivering a high-quality scheme which also contributes positively to the local area, they have been speaking to the Sureway International Christian Ministries about re-providing a space for them as part of a future scheme. Conversations are going well and Earlswood Homes are confident that they can find space for providing a high-quality new home for the church on the site.

Earlswood Homes would like to seek further clarification regarding the type of ground floor uses expected at the Site. Providing a new church facility is a large undertaking and will take up a significant proportion of the ground floor. However, as part of the Sites location in the Brixton CEZ, we understand the allocation also asks for flexible and creative workspaces along Junction Yard. Earlswood Homes consider that there should be some increased flexibility in the site allocation to provide either the community use for the church, or the creative workspaces. Ongoing discussions with the church alongside testing options for the proposals suggests that it would not be possible to deliver a standalone separate creative workspace use. It may be possible to include a limited amount of town centre use along the front of the site to provide greater activation, but a creative workspace would require too much space and would conflict with the re-provision of the church. Greater flexibility on this requirement in the site allocation would be welcomed.

e. Conclusion

In this letter, Iceni Projects have provided comments on behalf of Earlswood Homes on the Regulation 19 Draft Site Allocations Development Plan Document. The main purpose of this letter of representation is to seek minor changes to the draft allocation for Site 23, the Land at the corner of Coldharbour Lane and Herne Hill Road.

As set out in the letter, we feel a strong case can be made for certain small changes to the draft allocation. Following the recent proposed changes to the NPPF and the standard method for calculating housing need, this shows there is even greater need for housing in Lambeth and that

brownfield sustainable sites should be prioritised for the delivery of such housing. On this basis, it is considered that the Site 23 allocation should be amended as follows:

- Increase the housing capacity from 30 -40 homes to 40 – 50 homes.
- Allow greater flexibility for more heights to come forward if exceptional design can be presented, rather than setting a 30m cap.
- Provide more flexibility on the delivery of the ground floor uses, particularly if a new home for the church is being provided.

We consider that redevelopment of this Site would provide significant benefits and improvements to the local area. Earlswood Homes are committed to exploring redevelopment options for the Site and look forward to working with Lambeth's planning and design officers in due course.

Earlswood Homes would like to be kept up to date on the Local Plan process and have requested that they be made aware of any amendments to the site allocation or policy that may impact their interests.

This letter has been submitted to Lambeth with the accompanying Regulation 19 consultation response form. This should provide sufficient information for the comments to be considered. If there is any additional information required please do not hesitate to get in touch with me

[REDACTED]

Yours sincerely,

[REDACTED]

Ashleigh Bullough
Associate Director

From: Streatham Alliance [REDACTED]
Sent: 13 August 2024 16:06
To: SADPD
Subject: 1. Concern - Not Positively prepared - Strong Objection to the Proposed Redevelopment of the Public Car Park at Site 3 – Legal Noncompliance and Failure of Soundness
Attachments: 1. concern 1. Positively prepared SADPD_PSV_Reg 19 _Representation_Form_and_Equalities_Monitoring.pdf; attachment 2. Summary of Objections to the Redevelopment Proposal.pdf; attachment 4 local residents businesses opposition.pdf

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Dear Lambeth Council,

I am writing on behalf of myself and the opposing local residents and businesses to formally object to the proposed redevelopment of the public car park at Site 3, as detailed in the Site Allocations Development Plan Document (SADPD) Post- Submission Version (PSV). Our objections are based on significant concerns that the SADPD is both legally noncompliant and fails to meet the tests of soundness as outlined in the National Planning Policy Framework (NPPF), particularly paragraph 35.

1. LEGAL NONCOMPLIANCE

The SADPD exhibits several serious legal deficiencies:

Overlooked Residential Property: The planning documents fail to recognise an existing residential property that directly adjoins the site. This property, which has a private garden, was not considered in the proposal or evidence documents, leading to inaccurate and incomplete evaluations. This omission is a clear breach of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, which require that all relevant effects on adjoining properties be fully assessed.

Inadequate Consultation and Notification: The consultation process was flawed, as local residents and businesses were not accurately informed about the proposed development. The failure to notify the occupants of the adjoining residential property, as well as the wider community, meant that they were unable to make an informed decision or provide meaningful input. This lack of proper engagement violates the requirements under the Town and Country Planning (Local Planning) (England) Regulations 2012 and undermines the legitimacy of the entire consultation process.

Breach of Environmental Regulations Concerning Woodland Areas: The proposed redevelopment encroaches upon a Deciduous Woodland Priority Habitat located on the site. This area is legally protected under the Conservation of Habitats and Species Regulations 2017. The redevelopment plans fail to provide adequate measures to protect this vital natural resource, putting local biodiversity at risk and breaching national and regional environmental protection laws.

2. FAILURE OF SOUNDNESS

The SADPD fails the NPPF's soundness criteria, specifically:

Not Positively Prepared: The plan fails to meet the objectively assessed needs of the community. It disregards the critical need for public car parking spaces, which support local businesses and residents, including those with mobility challenges. The omission of the residential property in the assessments further demonstrates the plan's failure to account for the real impact on the local community.

Not Justified: The decision to redevelop Site 3 is based on flawed and inaccurate evidence. For example, the Heritage Impact Assessment and Daylight and Sunlight Assessment were conducted without considering the adjoining residential property / land, leading to conclusions that do not reflect the true impact of the development. The traffic assessments are similarly flawed, failing to account for the already strained local infrastructure and the importance of the car park to local businesses.

Not Effective: The deliverability of the redevelopment within the plan period is highly questionable. There are significant financial and logistical challenges that have not been addressed. Additionally, the plan does not provide a viable solution to the loss of essential public parking, which is likely to exacerbate local traffic congestion and reduce accessibility.

Inconsistent with National Policy: The proposed redevelopment conflicts with key aspects of the NPPF, including the requirement to protect and enhance the natural environment and heritage assets. The failure to properly assess the impact on the Deciduous Woodland Priority Habitat and the overlooking of the residential property are clear examples of how the plan fails to align with national policies on sustainable development and environmental protection.

ATTACHMENTS:

To support our objections, please find attached the following documents that can also be found at <https://www.dropbox.com/scl/fo/kznr8zvl02tc8kgz5j4zr/APj-hho0yMZdEeHJ-wsmVwE?rlkey=a9oq15zk4dtmr92bn7o6xwhex&st=ls34unnk&dl=0>

1 Representation Form 1 - not positively prepared

2. Summary of Objections to the Redevelopment Proposal: This document outlines the key objections to the redevelopment, based on an analysis of council documents and evidence.

3. Site 3 Applicable Context, Amendments and Corrections: This document lists corrections, relevant omitted context, and necessary amendments to the council's proposal documents. (available via the dropbox link due to file size)

4. Petition Signatures: To further demonstrate the depth of local opposition, I would like to highlight that within just three hours of street canvassing, 175 signatures were collected from local residents and business owners who are against the development. It is important to note that this impressive number was achieved with only one person collecting signatures, and many more could have been gathered had more people been aware of the proposal or if there had been additional collectors. This clearly reflects the widespread concern and strong opposition within the community to this inappropriate redevelopment.

The SADPD for Site 3 is both legally noncompliant and unsound. The proposed redevelopment is based on inaccurate information, fails to properly consult and inform affected residents and businesses, and disregards critical environmental protections. These fundamental flaws make the current plan untenable and legally indefensible.

In light of these significant issues, we strongly urge the council to halt the proposed development of Site 3 and initiate a process that accurately reflects the correct information, as well as the genuine needs and concerns of the local community.

Thank you for your attention to these matters.

Please kindly acknowledge this email.

We look forward to your prompt response.

Yours sincerely,
Tam Cushley

On behalf of SW16 Alliance, the 175 signees and the rest of opposing local residents and businesses of Lambeth.

Summary of Objections to the Redevelopment Proposal

The proposed redevelopment of Site 3 at Leigham Court Road is met with significant opposition based on numerous breaches of planning legislation, inaccuracies in documentation, and failure to comply with both The London Plan and Lambeth's Local Plan. The key objections are as follows:

Failure to Recognise Existing Residential Properties:

The planning documents fail to acknowledge an existing residential property at 33a Leigham Court Road, which directly adjoins the site. This omission leads to inaccurate assessments regarding the potential impact on this property, including privacy loss, overshadowing, and noise pollution. Such an oversight violates the requirement to consider and mitigate impacts on neighbouring properties.

Breach of Consultation Process:

The consultation process was flawed due to technical issues where not all relevant consultees were notified. This failure resulted in an unclear and inadequate consultation period, violating proper public consultation practices. Local residents and businesses were not accurately informed, undermining their ability to make informed decisions and assessments.

Heritage and Environmental Concerns:

The redevelopment will negatively affect nearby conservation areas, including the Streatham High Road/ Streatham Hill Conservation Area and the Leigham Court Road North Conservation Area. The development fails to preserve or enhance these heritage assets, conflicting with The London Plan and Lambeth's Local Plan.

The site includes a Deciduous Woodland Priority Habitat, crucial for local biodiversity. The redevelopment threatens this habitat, contradicting policies aimed at conserving biodiversity. This breach of environmental regulations is a significant concern.

Inaccuracies in Documentation and Misrepresentation:

The redevelopment plans incorrectly label the residential property at 33a Leigham Court Road as a "retail" unit. This misrepresentation undermines the validity of impact assessments and breaches planning regulations that require accurate site documentation.

The proposal fails to accurately map the site, leading to inappropriate planning decisions and further highlighting the significant flaws in the planning documentation.

Incompatibility with Sustainable Development Standards:

The redevelopment does not meet the required environmental standards, particularly concerning sustainable design and urban greening. The omission of the residential property in the assessments further demonstrates the project's failure to achieve these standards, making it inconsistent with The London Plan and Lambeth's Local Plan.

Loss of Essential Community Services:

The redevelopment will lead to the loss of a vital public car park, essential for local businesses, residents, and people with mobility issues. This loss has not been adequately addressed, further demonstrating the redevelopment's failure to meet community needs.

Legal and Regulatory Violations:

The redevelopment proposal breaches several legal frameworks, including the Conservation of Habitats and Species Regulations 2017. The failure to properly consult and consider the existing residential property and the Deciduous Woodland Priority Habitat is a violation of both national and local planning laws. Daylight and

Overshadowing Issues:

The redevelopment will significantly reduce natural light for the residential property at 33a Leigham Court Road, violating policies related to daylight and sunlight penetration. The proposal also includes incorrect shadow modelling, further undermining the project's legitimacy.

Failure to Align with Community Needs:

The proposal does not consider alternative uses for the site that would better serve the community, such as creating green spaces, allotments, yoyo centre or other community facilities. The development prioritises housing targets over community well-being and environmental sustainability.

Misleading Information and Omission of Crucial Details:

The Sustainability Appraisal and related documents were prepared without full context, notably omitting the existence of the residential property at 33a Leigham Court Road. This omission is a breach of legal duties under planning regulations, rendering the appraisal process flawed.

The proposed redevelopment of Site 3 is fundamentally flawed and should not proceed in its current form. The numerous breaches of legislation, inaccuracies in documentation, and failure to comply with established planning policies demonstrate that the project is not only inappropriate for the area but also legally and procedurally unsound. It is recommended that the site be removed from the Site Allocations Development Plan Document (SADPD) until substantial revisions are made to address these significant concerns.

SADPD PSV Representation Form (Reg 19 Stage)



Name of the document (DPD) to which this representation relates:

Please return to: sadpd@lambeth.gov.uk or
by post: Lambeth Council, Planning Policy and
Place Shaping, PO Box 80771, London SW2 9QQ

by **5.00pm on Tuesday 13th August 2024**

Please read the accompanying Guidance Note and Privacy Notice before completing the representation form or submitting your comments

This form has two parts –

Part A – Personal details (please see applicable privacy notices in the accompanying guidance note)

Part B – Your representation(s). Please fill in a separate sheet for each part of the SADPD PSV or associated PCPM you wish to make a representation about.

Part A

1. Personal details*

** If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's details (if applicable)

Address

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Postcode

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Telephone

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Email[†]

[†] Where relevant

<div>sw16alliance@gmail.com</div>	<div></div>
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Ref:

(for official use only)

Lambeth Site Allocations Development Plan Proposed
Submission Version January 2024 (SADPD PSV) and associated
Proposed Changes to the Policies Map 2024 (PCPM)

SADPD PSV Representation Form (Reg 19 Stage)

Part B – please use a separate sheet for each representation

3. To which part of the SADPD PSV or associated PCPM does this representation relate? (identify specific reference if possible)

Site Allocation	<input type="text" value="Site 3"/>	Section	<input type="text" value="ALL"/>	Policies Map	<input type="text" value="YES"/>
-----------------	-------------------------------------	---------	----------------------------------	--------------	----------------------------------

4. Do you consider the part of the SADPD PSV or associated PCPM that you identified in Q3 is:

(please tick)

4.1 Legally compliant

Yes

No

☒ NO

4.2 Sound[^]

Yes

No

☒ NO

4.3 Complies with the
Duty to co-operate

Yes

No

☒ UNSURE

[^] The considerations in relation to being 'sound' are explained in the notes at the back of this form. If

you have ticked 'No' to 4.2, please continue to Q5. Otherwise please go to Q6.

5. Do you consider the part of the SADPD PSV or associated PCPM that you identified in Q3 is unsound because it is not:

(please tick)

5.1 Positively prepared

☒ NOT Positively prepared

5.2 Justified

5.3 Effective

5.4 Consistent with national policy

(Please tick only one option. A separate form should be used if you wish to raise more than one concern.)

6. Please give details of why you consider the part of the SADPD PSV or associated PCPM that you identified in Q3 is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible

If you wish to support the legal compliance or soundness of the SADPD PSV or associated PCPM or their compliance with the duty to co-operate, please also use this box to set out your comments and then go to Q9.

All comments / representation given in attached email and supporting documents.

(If required continue on the additional comments page attached)

SADPD PSV Representation Form (Reg 19 Stage)

7. Please set out what change(s) you consider necessary to make the part of the SADPD PSV or associated PCPM that you identified in Q3 legally compliant or sound, having regard to the test you have identified in Q5 above where this relates to soundness. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why this change will make the part of the SADPD PSV or associated PCPM that you identified in Q3 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of this part of policy or text. Please be as precise as possible.

All comments / representation given in attached email and supporting documents.

(if required continue on the additional comments page attached)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change to the SADPD PSV or associated PCPM, do you consider it necessary to participate at the oral part of the examination?

☐

No I do not wish to participate at the oral examination

YES

Yes I do wish to participate at the oral examination

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To ensure the correct information is provided

(if required continue on the additional comments page attached)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

10. Please tick relevant boxes if you require notification of any of the following to your address stated in Part A:

☒

That the SADPD PSV and associated PCPM have been submitted for independent examination

☐

The publication of the inspector's recommendations following the independent examination

☐

The adoption of the SADPD and revised Policies Map.

Signature

Date

12/08/24

Please use this section for any additional/continued comments


**All comments / representation given in
attached email and
supporting documents.**

Equalities Monitoring not obligated

Petition to Lambeth Council

Contact details of the lead petitioner:

(the person the council will contact with a response to the petition)

Name (please print)	Address (please print)	Signature
TAM		

Contact details: Tel. (Work) _____ (Home) _____

Social _____ @SW16Alliance _____ (Email) sw16alliance@gmail.com

SAVE STREATHAM'S ONLY PUBLIC CAR PARK

LAMBETH COUCIL

Breach of

Conservation of Habitats and Species Regulations 2017

We the undersigned petition the council to:

• Immediately halt the proposed redevelopment of the car park on Leigham Court Road, Streatham Hill.

- The current development plan is fundamentally flawed.
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- Evidence given to make assessments is incomplete
- Irrefutably cause substantial and irreversible damage on local biodiversity and ecological networks
- Daylight Amenity Daylight Department - 37 page document detailing their errors
- Other reasons given in [email](#) &

Note: Individuals signing this request must be persons residing, studying or working in the borough.

Please present the petition to your local ward councillors (www.lambeth.gov.uk/councillors) or send it direct to: Democratic Services & Scrutiny, Olive Morris House, Brixton, SW2 1RD or email democracy@lambeth.gov.uk

Name (please print)	Address (please print)	Signature
1 Bolent YADIRGI		
2 John. Gentry		
3 Elissa Yadirgi		
4 Dillon Aubrey		
5 Ayslice Gardner		

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Name (please print)	Address (please print)	Signature
6 Naveen Gairme		
7 S. S. Binning		
8 R. Fairbairn		
9 D. Costetseki		
10 L. Bradley		

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Name (please print)	Address (please print)	Signature
11 Selashi		
12 Yeabsira		
13 Rakel		
14 Yewto Tenaye		
15 Lamin Rakel		

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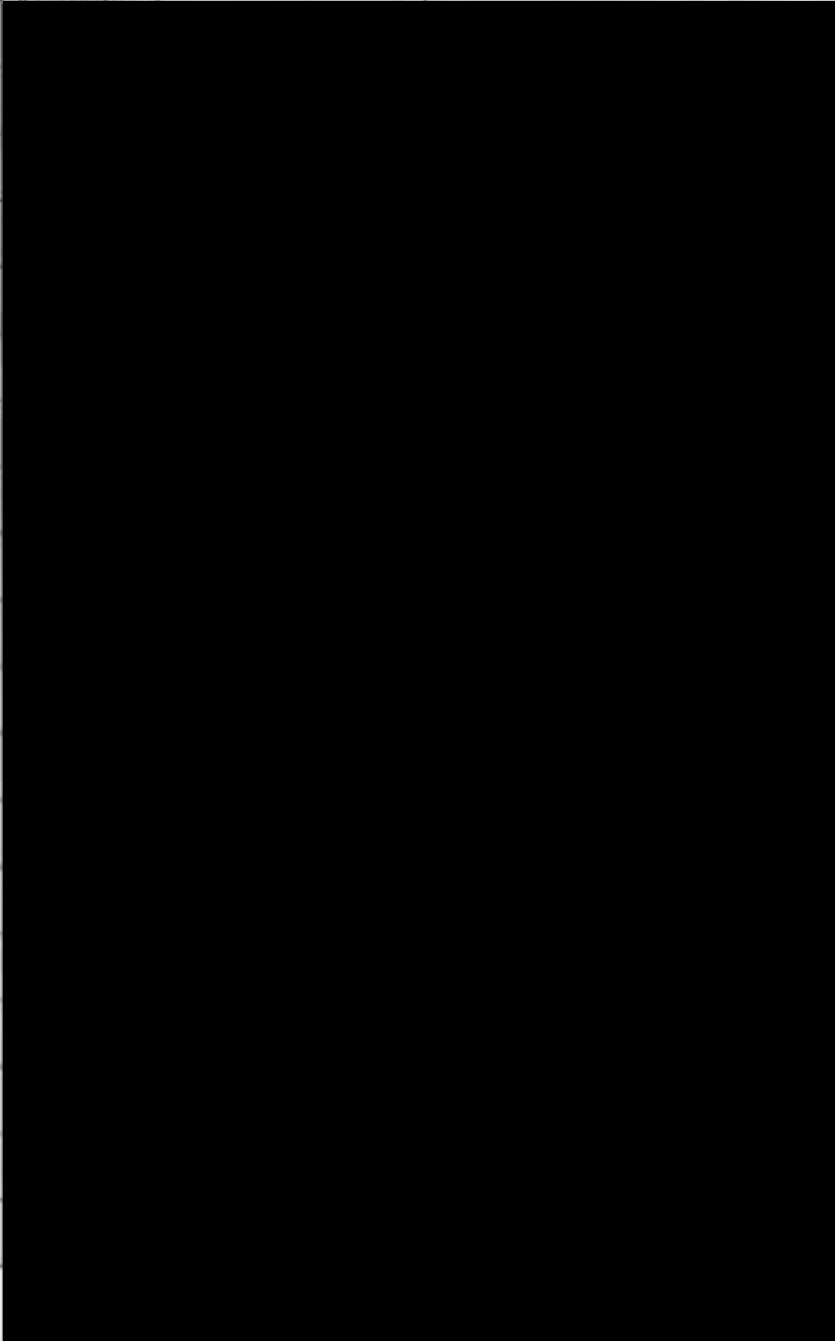
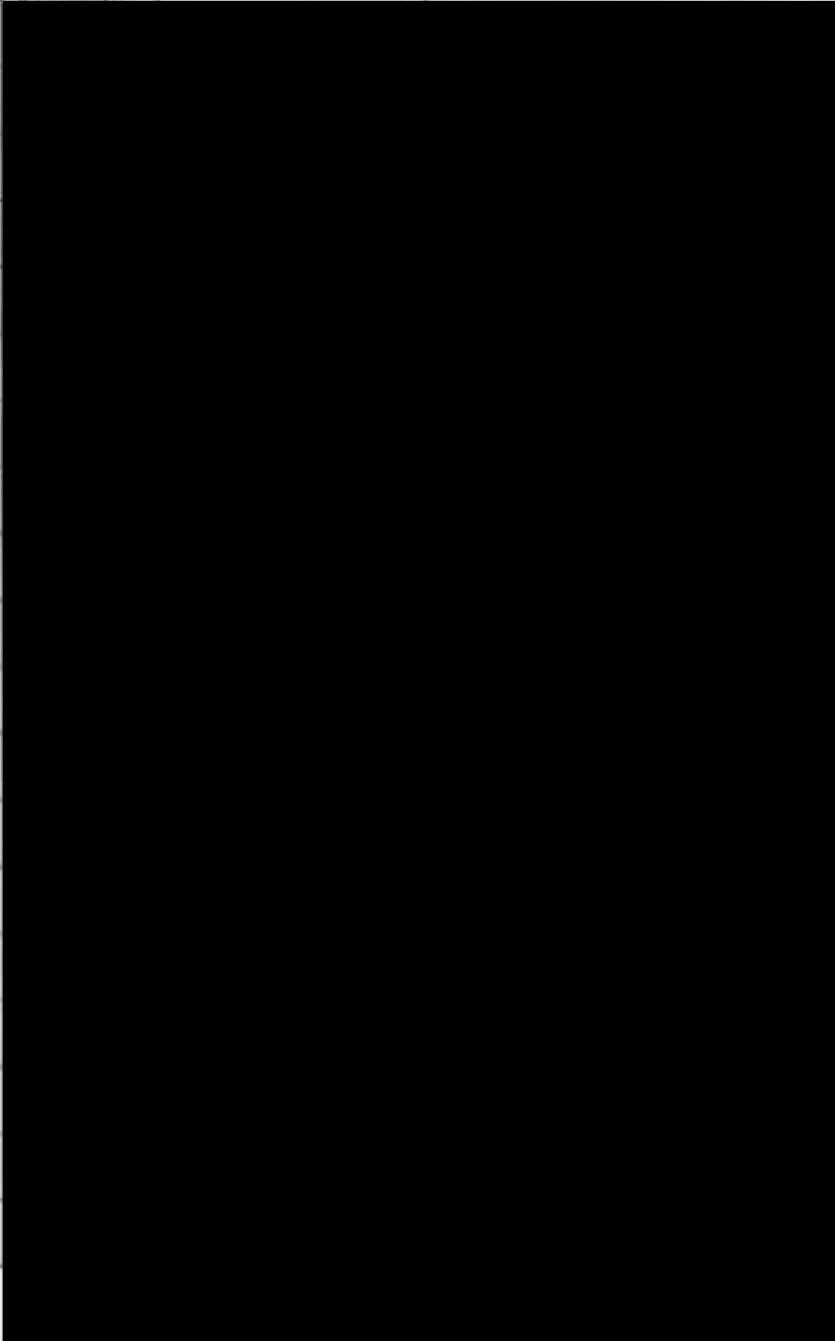



Name (please print)	Address (please print)	Signature
16 Jack		

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	Name (please print)	Address (please print)	Signature
22	Melani Costello		
23	BAZ		
24	SAM		
25	KARIM		
26	Tham		
27	Lucy		
28	Ziael		
29	Harish		
30	RONALD		
31	DYLAN		
32	DANIELA		
33	NICO POLLEW		
34	T.M. Mughal		
35	R. Monwarul		
36	M. LAWALAT		
37	KYAN		
38	S HILLIER		
39			
40			
41			

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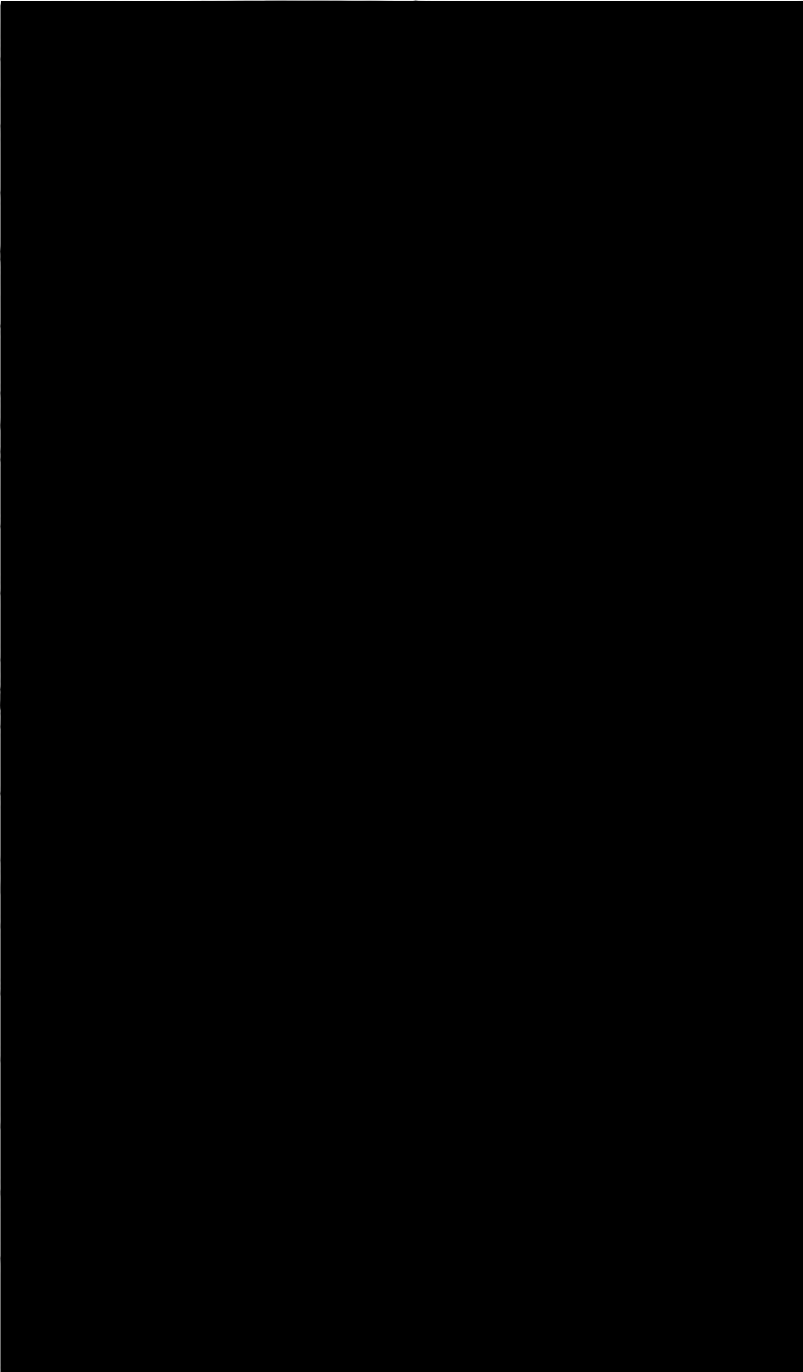
Name (please print)	Address (please print)	Signature
42 Ade Ibironke		
43 Abdulsalam Salawu		
44 R. B. B. B.		
45 Margaret Adefunso		
46 James Brown		
47 Craig Francis		

Page ____ of ____

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- Other reasons given in *amul*

	Name (please print)	Address (please print)	Signature
48	<i>My Zaki</i>		
49	<i>Lucy West</i>		
50	<i>T. Coshley</i>		
51	<i>Bu Kirkku</i>		
52	THAN H NGUYEN		
53	<i>Abu Louara</i>		
54	<i>SMA Shokouhi</i>		
55	<i>Anjali Sena</i>		
56	<i>M. HAMMED AL-KHAYAT</i>		
57	ZACHARIAH MARTIN		
58	<i>Winston Dwyer</i>		
59	<i>AYANA BLAIR</i>		
60	<i>Vandana</i>		
61	<i>Idar</i>		
62	JOSH DE LACEY		
63	FREDDY RAMIREZ		
64	ALEX MARCUS		
65	JESSICA ALLSON		
66	<i>Ashique Sami</i>		
67	<i>Gareth Christopher</i>		

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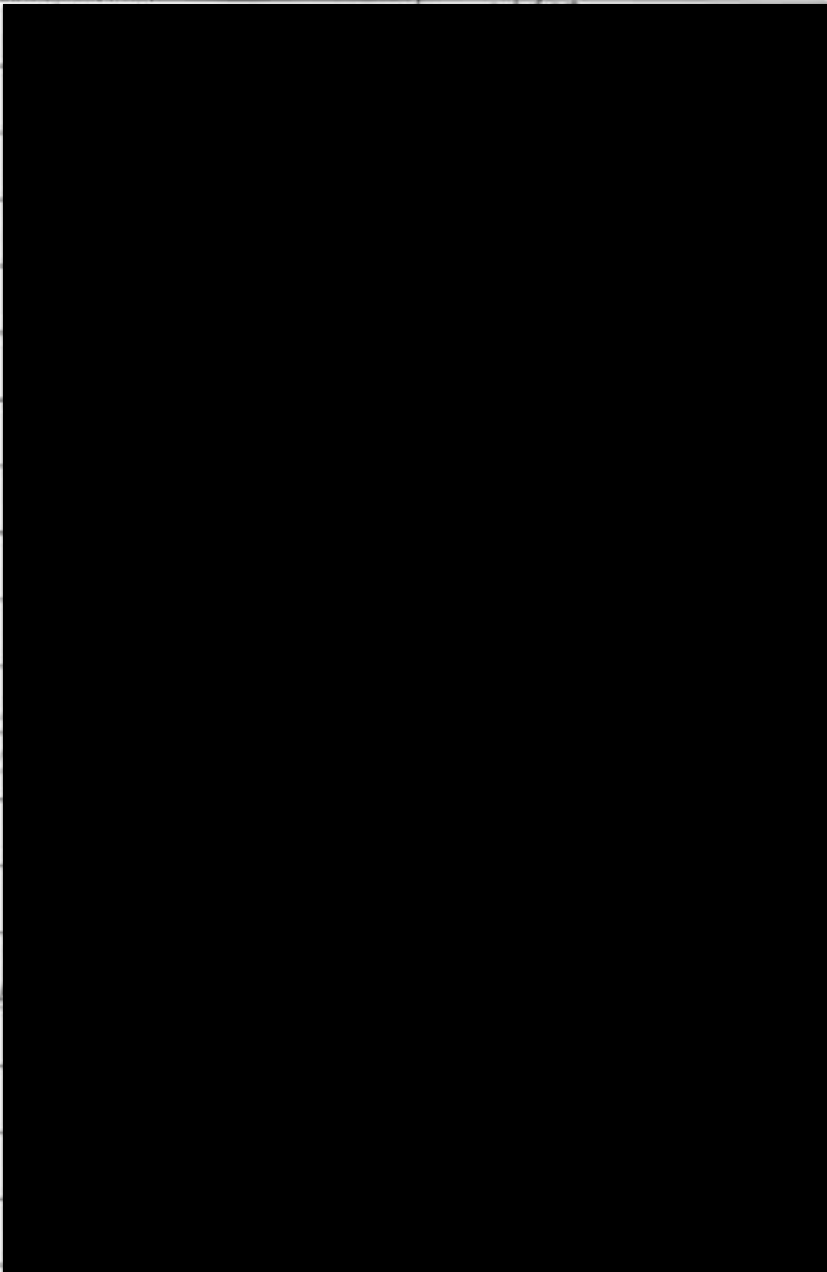
Name (please print)	Address (please print)	Signature
68 mangae lince		
69 Andrea Boulthorn		
70 R. LUNE		
71 M. Mahinga		
72 Fahim Chiehung		
73 Abs Oduka		

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	Name (please print)	Address (please print)	Signature
74	Emilia Mingo		
75	CLAUDIA CUNY		
76	LANA AVIS		
77	Jenelle Wright		
78	Roddy Gray		
79	KARL PARRISON		
80	Andrew Carter		
81	Sue Jones		
82	Jenae Mylon		
83	Emmanuel Morsel		
84	Anayah Hylton-Morison		
85	BASITA		
86	WILIZAR		
87	Yolanda Reis		
88	PAUL HAGE		
89	M. Pirell		
90	MARTIN GOFFE		
91	MIRKO VASSAL		
92	Anela Danka		

Bonnie Thompson

Petition to Lambeth Council

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Name (please print)	Address (please print)	Signature
TAM	LEIGHAM COURT ROAD	

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Name (please print)	Address (please print)	Signature
94 ALI KUNETHO		
95 DAISY		
96 Hannah		
97 Richi		
98 ISABELLE		
99 Sarah		

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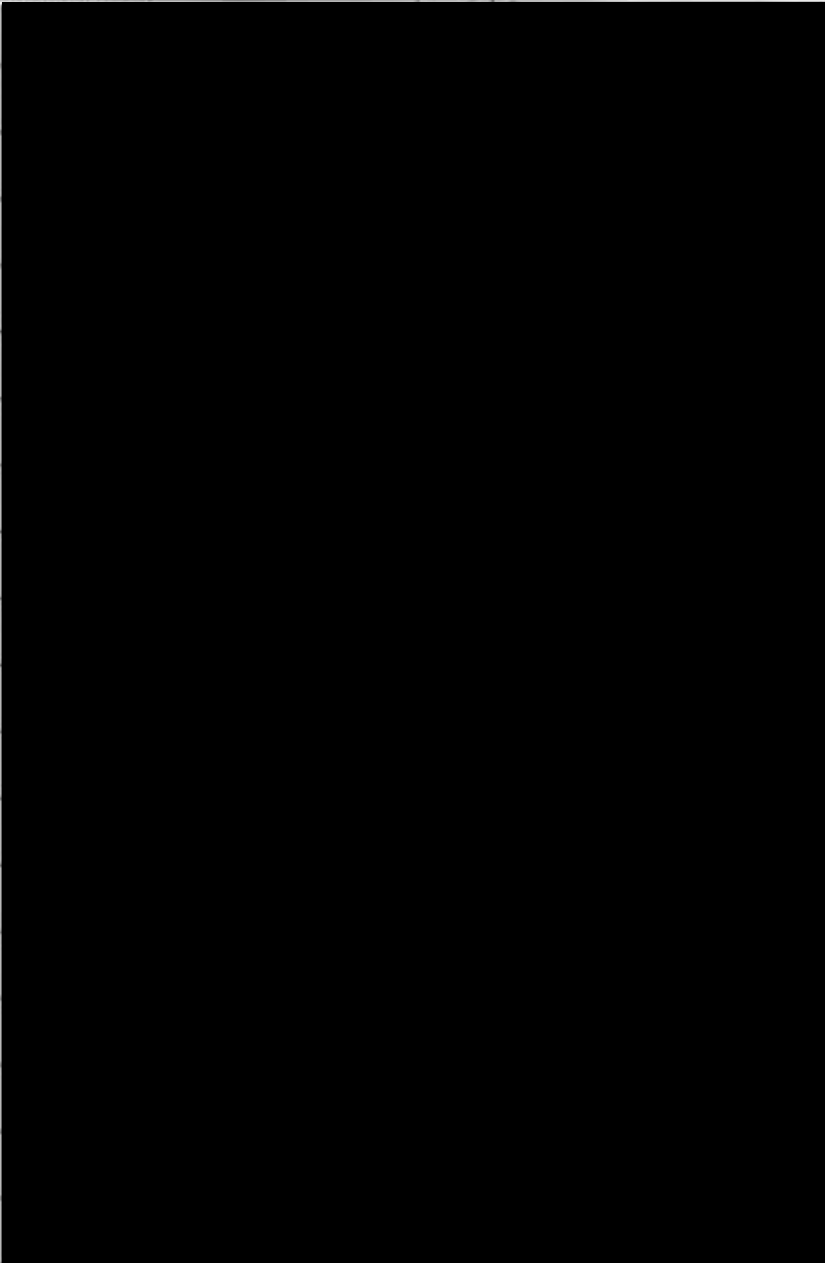
Name (please print)	Address (please print)	Signature
99105 Tyrell		
101		
102		
103		
104 C.A. Maccubbin		
105 H. JAMES		
106 Daniel Lundy		
107 ELEANORA RAGNI		
108 SID KAUHA		
109 MATT GAYNOR		
110 S.A.		
111 Pauline Roop		
112 Dominique Lantier		
113 Welke Gomes		
114 WAGNER		
X 20		
115 Raju		
116 Sufha		
117 Naclorajah		

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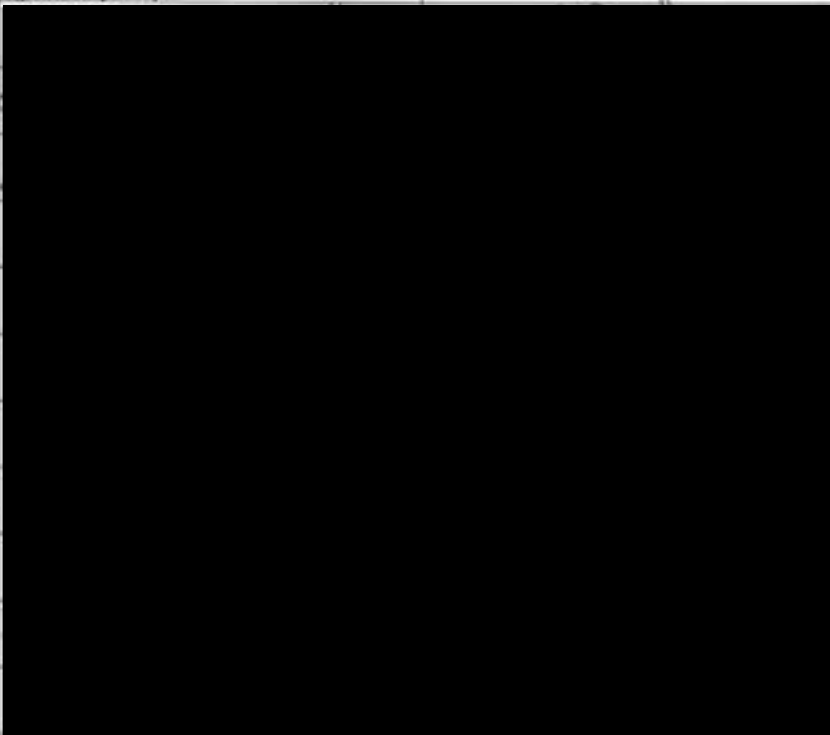
Name (please print)	Address (please print)	Signature
118 Leah McPherson		
119 JAMIE RICHARDSON		
120 Kheya Agboola		
121 Vanessa Michaela		
122 Shardonay		
123 Sonaya		
124 Quana T. Linc		
125 JULIA Leigh		
126 Summer		
128 Julia Cleh		
129 Uthman		
130 Cheanna Jackson		
131 Thonson		
132 Agallison		
133 Alwin		
134 Johannah		
135 Louise		
136 T. Binn		
137 Steve Slater		

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Name (please print)	Address (please print)	Signature
138 R. V. Arim		
139 Pafeng Ahmed Razak		
140 ANSALA		
141 Noreen		
142 Gloria		
143 Theam Amada		
144 Hyacinth		
145 Sharon Muir		
146 Joella		
147 Amayah		

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Name (please print)	Address (please print)	Signature
148 Michelle Green		
149 KATHERINE FINE WINE		
150 M. LUY		
X T. CUSHLEY		
151 A. CUSHLEY		

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Name (please print)	Address (please print)	Signature
158 STEPHEN YOUNG		
153 LA TORE PARCHA		
154 DERRICK DEWAR		
153 JOUAN BRYAN		
156 DEAN SMITH		

- _____

[illegible]

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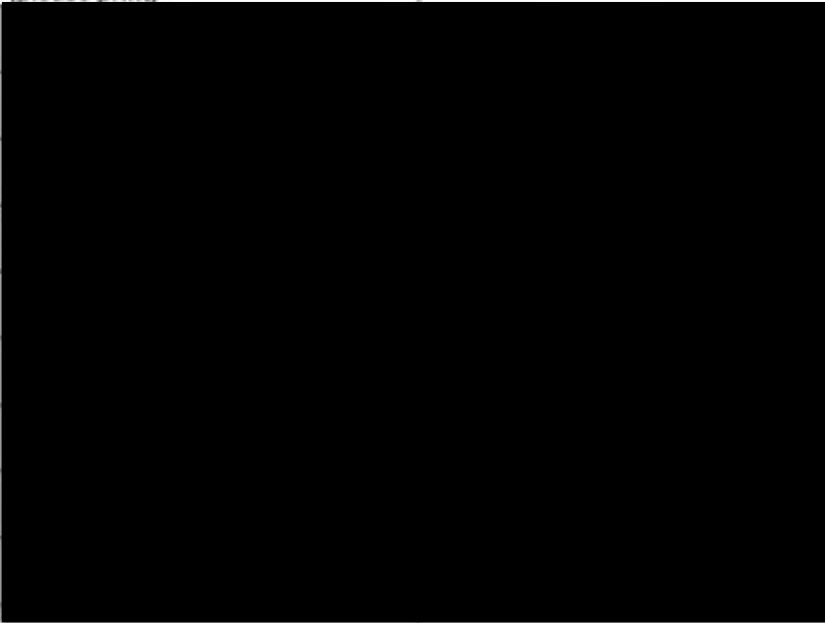
Name (please print)	Address (please print)	Signature
189 SECIWA DANG		
163 Sami		
164 TITIANA CAMPORISI		
165 Ali		
166 SAMUEL K. WISE		
167 Deborah Goble		

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Name (please print)	Address (please print)	Signature
168 TRA BI		
168		
170/167 Leireht Sath		
171/68 Paul Jarvis		
172/68 Tule		
173/70 Preet Chahal		
174 Mobeen		
175/71 SH. ZEJRAKHAH		
176/73 Ripon		
176		

From: Paul Clark [REDACTED]
Sent: 12 August 2024 15:31
To: SADPD
Subject: SADPD representation
Attachments: Lambeth Plan representations.pdf
Categories: Green category, Revisit

You don't often get email from [REDACTED] [Learn why this is important](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear sirs,

I have made a representation on behalf of AA Homes and Housing. When using the SADPD PSV survey form to submit the representation, I was expecting to be able to upload a document to elaborate on the representation but I reached the end of the survey before discovering any such opportunity. Attached please find the additional information which I wished to associate with the representation made.
Yours faithfully,

Paul Clark MA(Oxon) MA(TRP) MRTPI MCMI
Chartered Town Planner

On behalf of AA Homes and Housing

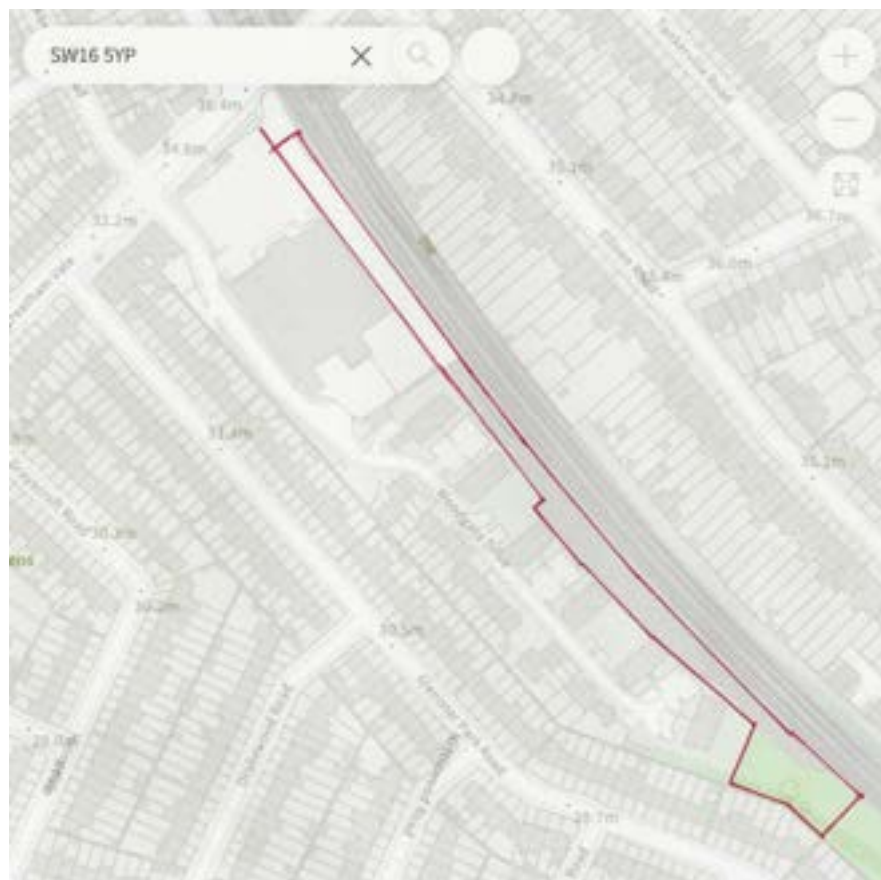
Representation on Lambeth Site Allocations DPD

Paragraph 1.12 of the proposed Plan sets out the rationale for the allocation of sites. The third bullet point of this rationale is "to articulate the vision and potential that can be achieved through land assembly and/or a comprehensive approach to developing adjacent sites, particularly where these are in different ownerships ". Paragraph 1.15 explains that the guiding approach in developing the draft site allocation policies is design-led optimisation of development capacity, as required by London Plan Policy D3.

Planning application 22/00300/FUL for the redevelopment of the site 100 Woodgate Drive London LONDON SW16 5YP, including demolition of all existing buildings and structures, comprising new homes across four new buildings and the provision of flexible Class E floorspace at ground level fronting Streatham Vale and Woodgate Drive, provision of associated private and communal landscaped amenity areas, play space, disabled parking spaces, refuse storage and cycle parking (consolidated and decentralised) with ancillary workshop was submitted on 26 January 2022 and was considered by Committee on Tuesday 19 March 2024. It was resolved to grant conditional planning permission subject to the completion of an agreement under s106 of the Town and country Planning Act, allowing six months for completion of the agreement. The outcome is not recorded on Lambeth's Planning Applications webpage.

If permitted the development would sterilise the development potential of much of the former railway land between the Woodgate Drive land and the railway line, shown on the following plan.

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This would clearly be an unsound planning practice. The designation of a combined site would fit the eligibility criteria for inclusion as an allocation within the Lambeth Site Allocations DPD. Its omission would be unsound. The following plan indicates the extent of the allocation sought.

