

Site Allocations Development Plan Document

Topic Paper 1: Rationale for the SADPD

October 2024

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1. INTRODUCTION

Introduction and Purpose of this Topic Paper

- 1.1. This topic paper sets out the rationale for the Site Allocations Development Plan Document (SADPD). It explains the purpose of the SADPD and its relationship with national policy, the London Plan and Lambeth Local Plan. It sets out an overview of the processes followed for the SADPD and how the site allocations were developed.
- 1.2. The principal objective of the SADPD is to unlock investment to provide benefits to local residents through the mechanism of site-specific planning policy. It provides further detail to and amends the site-specific policies already in the Lambeth Local Plan 2021.
- 1.3. Work began on the preparation of the SADPD in 2020. It was subject to Regulation 18 consultation in 2022 and two Regulation 19 consultations in 2024. Once adopted, the SADPD will form part of the development plan for Lambeth. The SADPD should be read, and policies will be applied, alongside and in conjunction with the rest of the development plan for Lambeth, namely the London Plan (2021), Lambeth Local Plan (2021) and made neighbourhood plans.

2. RELATIONSHIP OF THE SADPD WITH THE LAMBETH LOCAL PLAN

Policy Context

- 2.1. The National Planning Policy Framework (NPPF) makes it clear that local planning authorities should make sufficient provision for housing, employment and other uses. They should plan for and allocate sufficient sites to deliver the strategic priorities of the area.

- 2.2. In the case of London, strategic priorities are set out in the spatial strategy of the London Plan and its related policies. London borough development plan documents must be in general conformity with the London Plan.
- 2.3. To support the delivery of the London Plan, Lambeth will proactively and positively enable high quality development and places in the borough to secure substantial benefits and positive outcomes for residents, workers and visitors in Lambeth.
- 2.4. The Lambeth Local Plan (LLP) provides borough-specific policies to help support and implement the strategic priorities of the London Plan. The LLP covers the plan period 2020 – 2035. The LLP was adopted on 22 September 2021 and its policies are up to date.
- 2.5. The Council began work on the SADPD in late 2019 / early 2020 after the decision to prepare a SADPD separate from the revised LLP was made by Cabinet Members on 13 January 2020 and ratified by Full Council on 22 January 2020. The Cabinet and Council report noted that the LLP did not include new site allocation policies; these were to be brought forward through a subsequent SADPD, as set out in the Lambeth Local Development Scheme October 2019.
- 2.6. Policy H4 (iv) of the LLP commits Lambeth to “bringing forward a Site Allocations Development Plan Document to provide detailed policy for key sites, based on a design-led assessment of capacity”. In essence this will form Part 2 of the LLP and, together, the two documents set out the Council’s spatial and planning policy framework to promote, shape and manage inclusive growth in the borough over the 15-year period from 2020 to 2035. The SADPD covers the same plan period as the LLP for consistency between the two documents.
- 2.7. The SADPD includes thirteen site allocations. Of these sites, three have existing allocations in the LLP. These are Royal Street (Site 1), Gabriel’s Wharf and Princes Wharf (Site 9) and Norwood Road (Site 18). As anticipated in paragraph 11.5 of the LLP, the SADPD modifies and updates these site allocations, and the existing allocations will be superseded on adoption of the SADPD (see later).

2.8. Other existing site allocations in the LLP are unaffected by the SADPD and will remain in force unless and until they are superseded by new site allocations once the SADPD is adopted. All other policies within the LLP will similarly be unaffected by the SADPD and will remain in force for development management purposes. Annex 1 of the SADPD shows clearly the relationship between the existing and new site allocations, and the status that each will have following adoption of the SADPD.

Growth Requirements

2.9. As an inner-London borough, Lambeth is at the forefront of the national housing crisis. Lambeth currently has approximately 4,300 households in temporary accommodation and over 40,000 on the waiting list for social housing. Lambeth's vision is for all residents to have access to and benefit from safe, secure and high-quality local homes which are affordable and provide sanctuary, stability and the best conditions to grow up and age well – across all tenures.

2.10. The London Plan sets a housing requirement for Lambeth of 13,350 dwellings over the ten year period of 2019/20 to 2028/29. This target is also set out in Policy H1 of the LLP which seeks to maximise the supply of additional homes in the borough to meet and exceed the London Plan housing requirement. The London Plan requirement equates to 1,335 dwellings per year. Within this overall number, LLP Policy H2 seeks to maximise delivery of affordable housing in accordance with London Plan policy.

2.11. The council is committed to building new homes through a mix of direct delivery, partnerships, and through the planning system. Lambeth's ability to meet its London Plan housing target was demonstrated through the examination in 2021 of the LLP. However, the new site allocation policies in the SADPD 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 and new homes are delivered to meet the needs of residents.

- 2.12. The [Lambeth Housing Development Pipeline Report 2022/23](#) sets out the latest position on housing land supply. It states that Lambeth is able to demonstrate 5.49 years' worth of housing land supply for the 2023/24 to 2027/28 five-year period.
- 2.13. The Housing Pipeline Report is published annually. The Lambeth Housing Trajectory, which forms part of the Housing Development Pipeline Report, is in the process of being updated. This update will include evidence concerning the expected timescale for delivery of the SADPD site allocations. An updated schedule of expected delivery timescales for the SADPD site allocations will be presented for examination when this information is available. Some modifications to the Site Allocations showing delivery timescales will need to be made as a result of this update.
- 2.14. Lambeth contains two London Plan Opportunity Areas (OAs) which also have their own targets for housing and job creation. 'Waterloo' OA is wholly within the borough, while 'Vauxhall Nine Elms Battersea' OA is shared with the London Borough of Wandsworth. The targets for these OAs are identified in the London Plan and relate to the period 2019-2041. For Waterloo the target is 1,500 new homes and 1,600 new jobs, while for Vauxhall Nine Elms Battersea the target is 18,500 new homes and 18,500 new jobs.
- 2.15. Housing delivery in the OAs is monitored. The latest data for Waterloo relates to 2022/23 and shows that 744 homes have been delivered in the OA as of that year. Latest data for Vauxhall Nine Elms Battersea relates to 2023/24 and, as of that year, 4,313 homes had been delivered in the OA.
- 2.16. The SADPD is a mechanism available to the Council to maximise housing delivery in the borough and ensure the London Plan housing target is met and exceeded. The SADPD supplements the policies in the LLP to achieve delivery of its strategic priorities. It takes a design-led capacity-assessed approach to allocations, with testing of key assumptions such as development viability, to provide greater certainty on the quantum and tenure of housing to be delivered – alongside any other land uses required.

2.17. A key principle underpinning the SADPD is that all sites that are suitable for general needs housing should play their part in its delivery so as to maintain the pipeline of housing delivery and to ensure the council is doing all it can to meet and exceed the London Plan housing target. Furthermore, the challenge by the new government to accelerate the delivery of housing in London along with Lambeth's acute housing need further justifies the approach taken by the council to identifying the right type of development on each of the site allocations.

2.18. Site allocations within the Waterloo OA will also further help to deliver the OA housing target. Further details are set out below about the design-led optimisation approach that has been used to identify the capacity of the sites.

2.19. The Local Plan sets out key themes for the borough, of which the first two are 'Accommodating population growth' and 'Achieving economic prosperity and opportunity for all'. In essence this means a requirement for more homes and more jobs for local residents.

2.20. The SADPD balances the requirements for different types of development. Alongside housing, employment development is required in order to support investment, grow Lambeth's economy and provide jobs for local residents. A wide range of jobs is required in order to address the diverse needs of the workforce and both the LLP and the SADPD set out a positive approach towards employment and skills development. The LLP encourages office development in appropriate locations and protects the borough's existing office stock. It further defines Key Industrial and Business Areas (KIBAs) where existing industrial land is protected and new industrial development encouraged through intensification.

2.21. In this context, key principles for the SADPD include the maximisation of the employment potential of sites (always led by the approach of design-led optimisation) and the retention of industrial floorspace where this is already present within site allocations.

2.22. As well as accommodating significant housing and economic growth, the council also wants to deliver high quality places that people are proud to live in, are

environmentally and socially sustainable and improve the character of the borough as a whole. The SADPD will help to deliver on the council's commitment to securing high-quality design and construction across the borough. As set out in the LLP Policy Q7 'Urban design: new development' and its supporting text, high-quality design is key to delivering sustainable development. The site allocations in the SADPD provide more detail on the design expectations for development on these sites.

2.23. Through encouraging investment in the borough, the SADPD will help accelerate the provision of housing, including affordable housing, alongside commercial and community space plus key infrastructure for the benefit of existing and new residents.

Relationship with Sustainability Appraisal

2.24. Sustainability Appraisal (SustA) has been undertaken as the site allocations were developed, to assess the sustainability implications of particular forms of development on the sites, including reasonable alternatives. This has helped to inform the proposals in the SADPD.

2.25. As the SADPD has been developed several of the site allocations have been modified, including both the quantum of development proposed and the boundaries of the sites. The SustA process helped to identify the likely impacts of these changes and where such changes would result in improved sustainability outcomes.

2.26. The reasonable alternatives were revisited following Regulation 18 consultation on the SADPD. The SustA tested any substantial changes to the mix and quantum of development that occurred between the Regulation 18 draft of the SADPD and the Regulation 19 Proposed Submission Version.

2.27. The reasons for making changes to the boundaries of certain sites and the removal of one former proposed site allocation are detailed below. Further detail is also set out in the Sustainability Appraisal, document SD 05.

Relationship with Duty to Cooperate

2.28. In line with Section 110 of the Localism Act and Section 33A of the Planning and Compulsory Purchase Act 2004, a Duty to Cooperate Compliance Statement has been prepared which sets out the process that the council followed when engaging with stakeholders under the Duty to Cooperate. Positive discussions were held with adjoining boroughs and other key stakeholders throughout the preparation of the SADPD, and their input enabled improvements to be made to the Plan.

2.29. A key stakeholder with which the council worked closely was the Greater London Authority (GLA). Through a series of meetings and other engagement, the council and the GLA worked through and resolved any issues of potential non-conformity with the London Plan and also improved the wording of the site allocations so as better to help deliver London Plan policies.

2.30. A Statement of Common Ground between the council and the GLA notes that all remaining matters previously raised by the GLA have been resolved and there are no outstanding matters remaining. It further confirms that the SADPD is in general conformity with the London Plan.

3. DEVELOPMENT OF THE SADPD

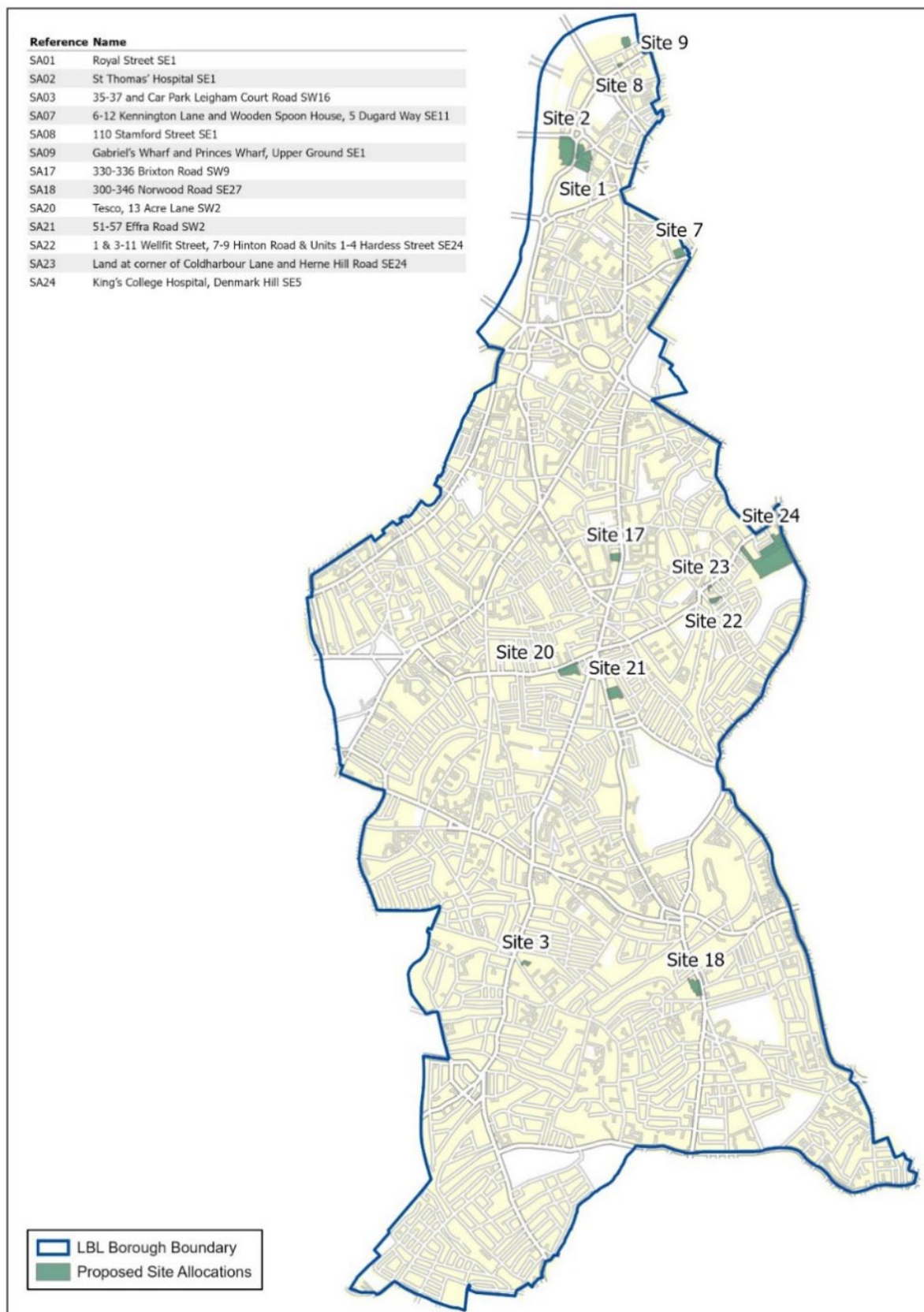
Site Allocations

3.1. The SADPD includes policies for thirteen sites. These are listed below and shown on the following Figure 1. Of these, Sites 1, 9 and 18 are existing site allocations that have been carried over from the LLP (see Annex 1 of the SADPD) and the remainder are new.

- Site 1: Royal Street SE1
- Site 2: St Thomas' Hospital SE1
- Site 3: 35-37 and Car Park, Leigham Court Road SW16
- Site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

- Site 8: 110 Stamford Street SE1
- Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1
- Site 17: 330-336 Brixton Road SW9
- Site 18: 300-346 Norwood Road SE27
- Site 20: Tesco, 13 Acre Lane SW2
- Site 21: 51-57 Effra Road SW2
- Site 22: 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24
- Site 23: Land at corner of Coldharbour Lane and Herne Hill Road SE24
- Site 24: King's College Hospital, Denmark Hill SE5

Figure 1: Proposed Site Allocations



3.2. A Site Selection Evidence Paper, document EB 01, has been prepared. This sets out how the sites in the SADPD were selected and provides justification for their inclusion as site allocations.

3.3. Sites are included in the SADPD for one or more of the following reasons:

- to set clear, site-specific parameters for the type and scale of development expected on a site, including the associated public benefits it should deliver;
- to address site-specific circumstances that may require a more tailored approach to that set out in borough-wide policies;
- 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;
- to encourage landowners to consider the potential for optimising the development capacity of their land and help deliver key placemaking objectives;
- to signal some additional sites as appropriate for tall buildings, outside the locations already identified in the Local Plan; and
- to enable key strategic infrastructure to come forward in a timely way.

3.4. The SADPD provides an opportunity to update and review some existing site allocations from the LLP. These are sites where it is considered that further updated guidance will be useful and will help bring forward development. Existing allocations where no update or modification was considered necessary will remain part of the adopted LLP.

3.5. The LLP was adopted in 2021. At that point, various site allocations were removed from the plan and others updated. The SADPD follows a similar approach, adding new sites and modifying others where updates were required. The new site allocations 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. Through encouraging investment in the borough, they will help accelerate the provision of housing, including affordable housing, alongside

commercial and community spaces plus supporting infrastructure for the benefit of existing and new communities.

- 3.6. It is not necessary to have a site-specific allocation for every potential development site in Lambeth. Many larger sites can and do come forward successfully without such a policy, with sustainable development achieved through application of the borough-wide and neighbourhood-level policies in the development plan as a whole.
- 3.7. Resources have been focussed on those sites where, for reasons of complexity, a design-led capacity assessment will add most value to help bring forward optimum capacity. For other sites, this outcome can usually be achieved through the application of borough-wide development plan policies. To be effective, it is necessary to achieve the right balance between the number of allocations included and preparation of the SADPD in a timely manner to help drive delivery.
- 3.8. As explained above, some existing LLP site allocations have been modified and updated in the SADPD. Some of the new proposed site allocations have also been amended between the Regulation 18 and Regulation 19 stages of the SADPD. The most significant boundary changes and the key reasons for making them are set out below.
- 3.9. The site allocations in the SADPD are presented in the following format:
- Contextual information, including area and site-specific maps showing relevant policy designations, constraints and opportunities.
 - A brief statement of the vision for the site, highlighting the opportunity presented by its redevelopment and its potential to contribute to strategic place-making.
 - The site allocation policy, setting out the requirements and expectations for the site.

Amendments made to Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1

3.10. Site 9 is a site at Gabriel's Wharf and Princes Wharf on the South Bank in Waterloo.

It forms part of a wider site allocation 'Site 9 – ITV Centre and Gabriel's Wharf' in the LLP, the boundaries of which are proposed to be amended in the SADPD. The amended boundary removes land at 60-72 Upper Ground which formed the former London Studios, also known as the London Television Centre, which closed in 2018.

3.11. When the SADPD was being developed, a planning application for comprehensive redevelopment of 60-72 Upper Ground was at an advanced stage. It was considered that the outcome of the call-in inquiry for that application would provide the context and steer required to enable the site's development to be progressed, with the contents of the decision letter guiding the process. Consequently, it was determined that 60-72 Upper Ground no longer needed to form part of the site allocation. This decision enabled available resources to be focused on an update to the remainder of site allocation, Gabriel's Wharf and Princes Wharf, where it was considered that a site allocation would still add value.

3.12. The site is allocated for mixed-use development including active frontage and cultural uses on the ground floor. 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.

3.13. The inclusion of a nursing home as a possible use if need is demonstrated responds to consultation representations made by the site owner, Coin Street Community Builders (see representation no. R0275). The council has agreed to put forward a change to the policy (as set out in the Schedule of Proposed Modifications, document SD 03) to allow for this.

3.14. Once adopted, the SADPD site allocation for Site 9 will supersede the existing site allocation in the LLP.

Amendments made to Site 18: 300-346 Norwood Road SE27

3.15. Site 18 is a site in West Norwood. It forms part of a wider site allocation 'Site 18 – 286-362 Norwood Road' in the LLP, the boundaries of which are now proposed to be amended in the SADPD. At the Regulation 18 stage the site allocation boundaries followed those in the LLP. Consultation feedback from residents objected to the perceived loss of existing housing within the site and, as a result, revised boundaries are now proposed.

3.16. Following a reassessment of the site, it was determined that various areas no longer needed to benefit from a site allocation. These included some areas of existing housing which were considered unlikely to come forward for development, a site that had subsequently received planning permission and was being built out, and some areas of relatively recent development. None of these areas were considered central to the site allocation and their removal would not prejudice its delivery.

3.17. In consequence of the proposed boundary changes, the site allocation has been refocused on the central part of the original site allocation and has been renamed 'Site 18 – 300–346 Norwood Road'. The revised site provides a significant opportunity for sustainable, mixed-use redevelopment to include new housing and affordable housing, flexible workspace, community uses and shops and food and drink uses that will contribute to the renewal of the shopping frontage on Norwood Road.

3.18. Once adopted, the SADPD site allocation for Site 18 will supersede the existing site allocation in the LLP.

3.19. Further details of the approach taken to development of the site allocation for Site 18 are provided in the 'Site 18 West Norwood' topic paper.

Amendments made to former Site 19: Knolly's Yard SW16

3.20. Site 19 related to an industrial site in West Norwood known as 'Knolly's Yard'. The site was located west of West Norwood town centre and was surrounded by a

triangle of railway lines, also being bordered by the roads Leigham Vale, Cameron Place, Knolly's Road and Harpenden Road.

3.21. Site 19 is not a site allocation in the LLP. It was included in the Regulation 18 version of the SADPD as a site allocation for comprehensive, mixed-use development including industrial intensification and self-contained housing. Following feedback received during that consultation, the site is no longer proposed for allocation.

3.22. Consultation feedback raised significant concerns as to the ability to achieve sustainable development on the site. Issues were identified with the scale of infrastructure that would be required to enable the site to come forward, and local residents expressed significant opposition to the principle and scale of development proposed. Also, the Greater London Authority (GLA) raised significant concerns about general conformity of the proposals with the London Plan.

3.23. Since the site is a Key Industrial and Business Area (KIBA), the industrial land within it is afforded policy protection. The SADPD proposed the site be redeveloped in a comprehensive manner following the principles of co-location, but the GLA considered the quantum of replacement industrial floorspace proposed in the site allocation to be unacceptable and that the potential for a larger amount of floorspace to be re-provided should be determined through a masterplan approach.

3.24. Alongside this, the relationship between the site owner Network Rail and their development partner EcoWorld came to an end and was not renewed. Network Rail are understood to be no longer actively promoting redevelopment of the site. This would make a masterplan exercise challenging to achieve and ultimately fruitless.

3.25. Considering all the issues raised and the change in circumstances regarding the deliverability of the site, the council determined that it was not possible to deliver sustainable development of the site at this time. To pursue the site allocation would not be a sound approach and the site is not allocated for development in the submission version of the SADPD.

3.26. The council maintains an objective to deliver appropriate policy-compliant development of the site in the long term but is not currently promoting or seeking such development. Removal of this site does not prejudice Lambeth's ability to meet its London Plan housing target and improves the overall soundness of the SADPD.

3.27. In a Statement of Common Ground between the GLA and the council, the GLA welcomed the removal of the site from the SADPD and confirmed that no issues of general conformity with the London Plan now remain.

Amendments made to Site 21: 51-57 Effra Road, Brixton SW2

3.28. Site 21 is a site comprising two retail warehouses on Effra Road in Brixton. It is a new site allocation in the SADPD.

3.29. At the Regulation 18 stage the site was significantly larger than is now proposed, also taking in land to the south comprising Fitch Court (a social housing development), Masey Mews (a residential road), the Mosaic Clubhouse (a facility for people with mental health conditions) and the Brixton Unitarian Church. Following feedback received during that consultation, revised boundaries are now proposed.

3.30. Following a reassessment of the site, it was determined that various areas no longer needed to benefit from a site allocation. In part this was driven by a change in council intentions for the future of Fitch Court. At the time the council originally intended to redevelop Fitch Court but now the existing housing is to be retained.

3.31. In its representations the Mosaic Centre expressed no desire to redevelop. With neither Fitch Court nor the Mosaic Centre available for redevelopment, the site boundaries were amended to focus on a smaller area.

3.32. Were the Mosaic Centre and Unitarian Church to be redeveloped, adopted policy in the LLP would require the facilities offered by those two sites to be replaced. While that could have been achieved as part of a wider, comprehensive redevelopment, it would be more challenging when considering the sites in isolation. When combined

with consultation feedback that raised concerns by service users about the temporary or permanent loss of the existing facilities, it was determined that there was no longer a useful purpose to include the sites within the site allocation. In consequence, the boundaries of the site allocation were redrawn to focus on the area of retail warehousing and associated car parking on Effra Road.

3.33. The site allocation is now within a single ownership and is capable of being brought forward for development independently. The amendment to the site boundary is considered sound and justified, as it reflects a realistic view of what can be delivered on the site and reacts positively to changed circumstances since the Regulation 18 SADPD.

Development Capacity

3.34. The SADPD sets out principles for how each site should be developed. Testing has been undertaken to establish the development capacity of each site and then to test the likely impacts of that development. Evidence has been gathered into such elements as the impacts of development on daylight and sunlight for neighbours, flood risk, impacts on design and heritage and the viability of development.

3.35. This testing approach explored one indicative way in which each site could be developed, in line with the policy principles established in the London Plan, LLP and SADPD. It is important to note that the resulting 'Indicative Approach' for each site in the design evidence is only for capacity assessment purposes. It is not a real proposal for development. Different development proposals are likely to come forward for each site. To be successful, they would need to comply with the policy context established by in the site allocation, other relevant Local Plan policies and any other material considerations.

3.36. The design-led optimisation of development capacity, as required by London Plan Policy D3.1.16 has involved analysis of the optimum mass and height that can be achieved on each site, having regard to site-specific planning constraints such as vehicular access and servicing, and including impacts on neighbouring uses, views,

townscape and heritage assets. Key spatial planning objectives have been factored in and identified in the resulting policy for each of the sites. This includes, for example: strategic place-making and contribution to implementation of the relevant policy for Places and Neighbourhoods; inclusion, accessibility and permeability in the public realm; healthy routes and active travel; community safety; townscape and heritage impacts

3.37. The Indicative Approach for each site is contained within the Design evidence base documents, documents DE 01 – DE 24.

Consultation Process

3.38. The Regulation 22 Consultation Statement, document SD 10, sets out the processes that were followed for consultation on the SADPD and how these align with both The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Lambeth Statement of Community Involvement.

3.39. Details of the main issues raised during the Regulation 18 and Regulation 19 consultations and how the council responded to these, along with any changes are provided in the Regulation 22 Consultation Statement.

4. SUMMARY AND CONCLUSION

Summary and Conclusion

4.

4.1. This topic paper has set out the rationale for the SADPD. The purpose of the SADPD and its relationship with national policy, the London Plan and LLP have been explained. An overview has been provided of the processes followed for the SADPD and how the site allocations were developed and amended.

4.2. Following its adoption, the SADPD will form part of the development plan for Lambeth. It will guide and facilitate development, and will form part of the suite of policies used to assess planning applications for the sites concerned.

- 4.3. Implementation of the site allocation policies will be monitored through the council's annual monitoring processes and progress with delivery will be reported and published annually through the Authority Monitoring Report.