

Statement of Common Ground between
the London Borough of Lambeth and the
Greater London Authority

September 2024

Context

This is a Statement of Common Ground (SCG) between the London Borough of Lambeth (LBL) and the Greater London Authority (GLA), on behalf of the Mayor of London, to support the examination of Lambeth's Site Allocation Development Plan Document Proposed Submission Version (SADPD PSV).

The purpose of the SCG is to document the continued engagement that has taken place between the two parties and demonstrate that there is agreement that the SADPD PSV is in general conformity with the London Plan 2021.

The SADPD PSV includes site-specific planning policies for thirteen sites in Lambeth, distributed across the borough. It will add site-specific policies to existing development plan policy. The principal objective of the SADPD is to unlock investment through the mechanism of site-specific planning policy. It will support the implementation of wider Council strategies including the Borough Plan 2030, Economic Resilience Strategy 2022, Transport Strategy 2019 and Climate Action Plan 2022.

Once adopted, the SADPD and Lambeth Local Plan 2021 will form part of the Development Plan for the borough, alongside the South Bank & Waterloo Neighbourhood Plan, and the London Plan 2021.

Lambeth's response to the Mayor's comments

Regulation 18 consultation on the draft SADPD took place between 10 January and 22 February 2022. Following Regulation 18 consultation, LBL Officers considered, in detail, the representation submitted by the GLA. The council's response to Regulation 18 representations received is set out in Table 1 of Appendix 1.

In the spirit of collaborative working, LBL Officers met with their counterparts at the GLA to discuss the representations and reached agreement on the majority of points raised. The policy text and accompanying plans of the SADPD were updated ahead of Regulation 19 consultation that took place between 8 March to 3 May, 2024.

Following Regulation 19 consultation, LBL has reviewed the GLA's representation, and are pleased to note that all remaining matters previously raised by the GLA have been resolved. The letter confirms that the SADPD PSV is in general conformity with the London Plan. Details are set out in Table 1 of Appendix 1.

LBL welcomes the additional comments from TfL on transport matters that were attached to the GLA's Reg 19 representation. The amendments requested by TfL primarily relate to minor corrections and clarifications which LBL is pleased to incorporate in the final version of the SADPD. These will be included as part of the Schedule of Proposed Changes which will be submitted alongside the SADPD PSV for examination.

Mayor's response to LB Lambeth's comments

GLA officers have enjoyed working in collaboration with LBL officers and will continue to offer their support in the preparation of the Development Plan.

Statement of Agreement

LBL and the Mayor agree that the position set out in Table 1 of Appendix 1 provides an accurate position of comments received at each stage of plan preparation. LBL has incorporated all recommended updates/changes into the SADPD PSV with no outstanding matters remaining.

Signed for London Borough of Lambeth by:

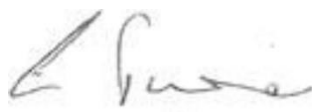


Ciara Whelehan

Assist Director of Policy and Placemaking
London Borough of Lambeth

Date: 8 August 2024

Signed for the Mayor of London by:



Lucinda Turner

Assistant Director

Planning and Regeneration

Greater London Authority

Date: 11 September 2024

Appendix 1 – Summary of GLA’s Reg 18 (10 January to 22 February 2022) and Reg 19 (8 March to 3 May 2024) representations and LBL’s response

Ref	Issue / Site Name	Mayor’s response to Regulation 18 Draft SADPD	Lambeth’s response to Mayor’s Reg 18 comments	Mayor’s response to Regulation 19 SADPD PSV
General point 1	Industrial land	<p>The Mayor welcomes the preparation of Lambeth’s Site Allocation DPD and the commitment to delivering sustainable growth and investment in Lambeth as well as the design-led approach to optimising the development capacity of sites, in accordance with London Plan Policies D1 and D3. However, the current approach to industrial land, particularly on Site 19 Knolly’s Yard, is likely to be an issue of general conformity and further detail on this is provided below.</p> <p>The Mayor recognises that Lambeth’s recently adopted Local Plan (September 2021) sets out the borough’s ability to meet its housing target and that this new Site Allocations DPD intends to help accelerate delivery of housing in the borough by maintaining a pipeline of new housing and thereby ensure housing delivery targets continue to be achieved.</p> <p>The Lambeth Local Plan 2021 also sets out that industrial floorspace capacity will be retained to protect the Central Services Area (CSA) by updating the policy approach to Key Industrial Business Areas (KIBAs) (the London Plan Locally Significant Industrial Site (LSIS) equivalent). This policy approach is to ensure that any scope for intensification within KIBAs must be prioritised</p>	<p>Comments noted.</p> <p>Regarding the concerns noted for Site 19 Knolly’s Yard, Lambeth can confirm this site has been deleted and is no longer proposed for allocation.</p> <p>Lambeth’s approach to protection and intensification of industrial land is set out in the policies and supporting text of the Lambeth Local Plan 2021, particularly policies ED3 and ED4. This approach was found to be in general conformity with the London Plan 2021 and the Local Plan includes the wording agreed with the Mayor through the statement of common ground prior to submission of the Plan for examination. The Lambeth Local Plan also includes a Monitoring Framework to enable monitoring of the key strategic policies, reporting on in annual commercial and housing development pipeline reports and the Lambeth AMR. Monitoring indicator IND10 (see Annex 2 of the Lambeth Local Plan) specifically monitors net change in industrial land.</p> <p>The SADPD only includes proposed allocations for thirteen sites in the borough, where there is a specific need for site-specific policy in addition to the rest of the up-do-date development plan.</p>	<p>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.</p> <p>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.</p>

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		<p>for industrial floorspace capacity, rather than to allow space for non-industrial uses.</p> <p>The Lambeth Local Plan 2021 was supported by a review of Lambeth's KIBAs that established a shortfall in industrial capacity across the borough. The review proposed four new KIBA designations to offset the losses that have gradually eroded LSIS within the borough, but the result was still an overall net loss of industrial land.</p> <p>The Inspector's Report for the Lambeth Local Plan noted that <i>'Whilst the four new KIBAS are not adding to the overall stock of industrial land, the much stronger policy protection afforded through KIBA designation is expected to make a significant contribution to retaining and intensifying industrial floorspace capacity in Lambeth'.</i></p> <p>The Mayor therefore expects to see that Lambeth's Site Allocation DPD not only protects the existing industrial floorspace within KIBAs, but also shows how it will be intensified. A table setting out the existing and proposed industrial floorspace on relevant sites would be useful to accurately show there is no net loss of industrial capacity proposed in the DPD.</p>	<p>It is not intended to include allocations for every potential development site that includes opportunity for industrial intensification. It is therefore not appropriate to monitor change in industrial capacity borough-wide through the SADPD. This will be undertaken through the existing Monitoring Framework in the Lambeth Local Plan.</p> <p>In addition, the land use section for the following sites has been updated to confirm sites are expected "to achieve no net loss of existing industrial floorspace capacity":</p> <ul style="list-style-type: none"> • Site 7: 6-21 Kennington Lane and Wooden Spoon House, 5 Dugard Way; • Site 17: 330-336 Brixton Road; • Site 18: 300-346 Norwood Road; and • Site 22: 1&3 – 11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street <p>Additional text has been added stating "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>	

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General point 2	Brixton CEZ	A number of the sites in the DPD are located within the Brixton Creative Enterprise Zone (CEZ) and should take note of the requirements of LP2021 policies HC5 and E3 to help deliver spaces that are suitable, attractive and affordable for the creative industries.	<p>The Draft SADPD explicitly seeks new workspace on sites within the Brixton CEZ that would support growth in the creative and digital industries in that part of the borough.</p> <p>The land use section of the following sites has been updated to include reference to London Plan Policy HC5C:</p> <ul style="list-style-type: none"> • Site 17: 330-336 Brixton Road; • Site 21: 51 – 57 Effra Road; • Site 22: 1&3 – 11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street; and • Site 23: Land at corner of Coldharbour and Herne Hill Road. <p>In relation to affordable workspace, London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in Development Plan Documents. Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because</p>	Other changes in the SADPD respond positively to the Mayor's comments made at the Regulation 18 stage to take account of sites located within the Brixton Creative Enterprise 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.

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			<p>development values for that use were not found to be strong enough to justify an affordable workspace requirement.</p> <p>Local Plan policy ED2 would therefore not apply to the proposed approach set out in the draft site allocation for sites required to provide workspace within the Brixton CEZ, which is why it is not referenced in those draft site allocations.</p>	
General point 3	Play on the way	The Mayor welcomes the reference in Site 21 to incorporating children and young people-friendly features such as play-on-the-way parallel playable routes and this is in line with the Mayor's Healthy Streets approach and LP2021 Policy S4, however this approach should be applied consistently across the other relevant site allocations within the document.	<p>Accepted. This approach can be replicated across other relevant site allocations.</p> <p>"Landscaping should incorporate children and young people-friendly features such as play-on-the-way parallel playable routes" will therefore be added to the following site allocations:</p> <ul style="list-style-type: none"> • 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 • Site 17: 330-336 Brixton Road • Site 18: 300-346 Norwood Road, SE27 	<i>No further comments provided on this matter.</i>

Ref	Issue / Site Name	Mayor's response to Regulation 18 Draft SADPD	Lambeth's response to Mayor's Reg 18 comments	Mayor's response to Regulation 19 SADPD PSV
			<ul style="list-style-type: none"> • Site 20: Tesco, 13 Acre Lane, 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 	
Site 1	Royal Street SE1	<p>This site allocation supersedes the existing site allocation within the Local Plan 2021. It is located with the Waterloo Opportunity Area and the Central Activities Zone (CAZ) and contains 19,221 sqm of office floorspace.</p> <p>In accordance with Policy SD5 LP2021 residential or mixed-use development proposals should not lead to a net loss of office floorspace in any part of the CAZ unless there is no reasonable and demonstrable prospect of the site being used for offices.</p> <p>The Site Allocation should make clear the level of office space to be re-provided. We welcome the requirement for 10% of the net uplift in office floorspace for affordable workspace and the exclusion of E uses outside of the retail cluster.</p>	<p>Accepted. The following wording will be added to the land use section of this site allocation: "The quantum of new office floorspace should be equivalent to or greater than the existing quantum of office floorspace on site."</p>	<i>No further comments provided on this matter.</i>
Site 2	St Thomas' Hospital SE1	<p>We welcome the acknowledgement of the need to preserve or enhance the setting and Outstanding Universal Value of the Westminster World Heritage Site. To be consistent with Policy HC2 of the LP2021 the allocation should</p>	<p>Accepted – the following wording will be added to the heritage assets section of site allocations policy 2: "A desk-based archaeological assessment and a Heritage Impact Assessment will be required."</p>	<i>No further comments provided on this matter.</i>

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		consider whether development proposals would need to be supported by Heritage Impact Assessments.	The same wording will be added to the policy for Site 1.	
Site 7	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11	<p>The Mayor welcomes the intention to protect existing industrial capacity. As part of the site contains undesignated industrial uses, Policy E7C of the LP2021 applies and should be reflected in the proposed allocation.</p> <p>As the borough is in the CSA, there should be a greater focus on the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021 and this should be incorporated into the allocation. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p> <p>It is noted that an affordable housing threshold of 42% has been set across the site as a whole. The site allocation should make it clear that the 50% threshold only applies to the land with is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply.</p>	<p>London Plan policy E7C relates to development proposals rather than the preparation of development plan documents. It acknowledges that sites in use as non-designated industrial land can be allocated for residential or mixed-use development, which is what is proposed in Lambeth's Draft SADPD for this site.</p> <p>London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021.</p> <p>The following wording has been added to the land use section of this allocation:</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</p>	Central Services Area and an associated reference to paragraph 6.4.7 of the LP2021.

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			<p>uses has been considered and explain the outcome of that consideration.”</p> <p>With regards to the comment about affordable housing thresholds, Lambeth officers consider that the existing wording in the draft SADPD is very clear on this subject and does explicitly address the points raised.</p>	
Site 8	110 Stamford Street SE1	This site is located within CAZ and is long term vacant. As per LP2021 Policy SD5, offices and other CAZ strategic functions are to be given greater weight relative to new residential development in this area. The proposed site allocation appears to prioritise residential uses (30 to 40 units) with community/office floorspace only at ground floor level.	<p>The following wording will be added to the land use section of this policy:</p> <p>“In accordance with paragraph 2.4.5 of the London Plan 2021, new residential development on this site should complement and not compromise the strategic functions of the CAZ.”</p> <p>The same wording will be added to site allocation Policy 9.</p>	<i>No further comments provided on this matter.</i>
Site 17	330–336 Brixton Road SW9	This site contains light industrial uses, medical services and offices but is not designated as LSIS. The Mayor welcomes the intention to protect existing industrial capacity. The site allocation proposes offices uses as part of a mixed-use re-development, however the site is not located within a town centre. To be consistent with Policy E1D of the LP2021 office development should be focused in the CAZ, town centres and existing office clusters, where supported by	The draft site allocation requires reprovision of the existing quantum of office floorspace. This is consistent with Local Plan policy ED1, which was in turn found sound and in general conformity with the London Plan. Where there are existing offices in Lambeth, even outside of town centre locations, these are protected in policy. However, we would not support an uplift in office floorspace in an out of centre location (unless the requirements of the sequential test were met). It is also important to recognise that	<i>No further comments provided on this matter.</i>

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		<p>improvements to walking, cycling and public transport connectivity.</p> <p>As the site is located within Brixton Creative Enterprise Zone (CEZ) LP2021 Policy E3 applies. The site allocation should refer to the requirements of Part A, specifically for affordable workspace for sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace.</p> <p>As part of the site contains undesignated industrial uses, Policy E7C of the LP2021 applies and should be reflected in the proposed allocation.</p> <p>As the borough is in the Central Services Area (CSA), there should be a greater focus on the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021 and this should be incorporated into the allocation. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p> <p>It is noted that an affordable housing threshold of 38% has been set across the site as a whole (as an average). The site allocation should make it clear that the 50% threshold only applies to that land which is considered to be 'public land'</p>	<p>the existing office space is owned and occupied by Lambeth Accord/WeAre336, which is a social enterprise with expertise in providing support, and letting space, to people with disabilities. They wish to remain on the site (of which they are the freeholder) following redevelopment, so to require a loss of offices would render the allocation undeliverable and would result in objections from a key landowner.</p> <p>London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in Development Plan Documents. Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED2 would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift if office floorspace would not be supported), which is why it is not referenced.</p>	

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		<p>for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply i.e. different thresholds should apply to the relevant parts of the site. The 50% threshold will also apply to those parts of the site which are currently industrial where residential development would lead to a loss of industrial capacity.</p>	<p>London Plan policy E7C relates to development proposals rather than the preparation of development plan documents. It acknowledges that sites in use as non-designated industrial land can be allocated for residential or mixed-use development, which is what is proposed in Lambeth's Draft SADPD for this site.</p> <p>The land use section has been updated to read:</p> <p>"Redevelopment should include replacement office and community floorspace of equivalent or better functionality, 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>London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021.</p> <p>The following wording has been added to the land use section of this allocation: "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</p>	

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			<p>'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> <p>With regards to the comment about affordable housing thresholds, the text has been updated to read "The affordable housing threshold will range from 35 per cent (privately owned land) to 50 per cent (publicly owned land) as the site is in a mix of private and public ownership".</p>	
Site 18	286-362 Norwood Road SE27	It is noted that a threshold range of 35% to 50% affordable housing has been set across the site as a whole. The site allocation should make clear that the 50% threshold only applies to the land which is considered to be 'public land' for the purposes of the Mayor's threshold approach and not the land in private ownership where the 35% threshold will apply.	Accepted. The text has been updated to read "The affordable housing threshold will range from 35 per cent (privately owned land) to 50 per cent (publicly owned land) as the site is in a mix of private and public ownership".	No further comments provided on this matter.
Site 19	Knollys Yard SW16	This site, although already in industrial use, was allocated as one of four new KIBAs as part of the Lambeth Local Plan 2021 to help to offset the overall net loss of industrial land. The Local Plan recognised the importance of prioritising intensification for industrial uses within KIBAs and this site was identified as having potential for industrial intensification and co-location with other uses.	Comments noted. The site has been removed and is no longer proposed for allocation.	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.

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		<p>The Plan also noted that the appropriate amount of industrial floorspace to be re-provided on these sites will be assessed as the existing quantum of floorspace and/or actively used yard space, or 65 per cent plot ratio, whichever is greater for the site in question.</p> <p>The Review of KIBAs 2020 notes that this site has 9,189 sqm of industrial floorspace. The provision of 1,500sqm of industrial floorspace stated in the site allocation is unacceptable and the potential for industrial re-provision on this site should be determined through a masterplan approach in line with LP2021 policy E7B and D and the Mayor's practice note on industrial intensification and co-location through Plan-led and masterplan approaches. See https://www.london.gov.uk/sites/default/files/practice_note_-_industrial_intensification.pdf In order for the principle of co-location to be acceptable, the masterplan should clearly demonstrate how design mitigation will ensure successful co-location of industrial and residential uses and how the agent of change principle will be followed as set out in LP2021 Policy E7 part D3 and Policy D13. As this is a site allocation DPD, the masterplan could be developed and approved through the site allocations document.</p>		

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		As Lambeth is located within the CSA, the site allocation should incorporate the types of uses that provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.		
Site 20	Tesco, 13 Acre Lane SW2	This site has a PTAL of 6a. The site allocation states that London Plan parking standards would apply, however it then goes on to state that a replacement store is expected to 'need an appropriate level of parking to operate effectively'. Table 10.5 in the LP2021 requires car-free parking standards for retail within all areas of PTAL 5-6. Car parking provision in this location should be kept to a minimum focusing on the need for disabled bays and space should be used for activities that create vibrancy and contribute to the formation of liveable neighbourhoods.	<p>The landowner has made clear that they will not be incentivised to bring the site forward for mixed use development if an element of parking for shoppers is not supported, albeit a lower level than currently on the site.</p> <p>The transport, movement and public realm section has been updated to include reference to London Plan Policies T3, T5, T6, T7 and Q13.</p> <p>LBL consider (with justified evidence) a reduced level of parking could be provided on the site. The 'Transport, movement and public realm; section' has therefore been updated to read:</p> <p><i>'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</i></p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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			<p><i>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 (...)</i></p> <p><i>A replacement supermarket of equivalent net sales area to the existing store is expected to need some parking to operate effectively. 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. However, some car parking will be re-provided, with a focus on disabled parking and electric vehicle charging. An applicant will need to provide an evidence-based justification to justify any level of parking over and above London Plan standards. Non-car access and pedestrian accessibility to the store should be positively promoted through scheme design.'</i></p> <p>LBL Officers have advised the site promoters further evidence for e.g parking and interview surveys should be provided ahead of the Examination to justify a reduced level of parking at the site.</p>	
Site 21	51–65 Effra Road SW2	This site allocation supports the aims of the CEZ by replacing out-of-centre retail with community uses and light industrial floorspace. However, the allocation should refer to the requirements of policy E3 Part A LP2021, specifically for	London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in	No further comments provided.

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		<p>affordable workspace for sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace.</p> <p>Due to the borough's location within the CSA, the allocation should incorporate the need to provide essential services to the CAZ in accordance with paragraph 6.4.7 of the LP2021. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p> <p>The references to incorporating children and young people-friendly features such as play-on-the-way parallel playable routes are supported. This is in line with the Mayor's Healthy Streets approach and LP2021 Policy S4.</p>	<p>Development Plan Documents. Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED2 would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift if office floorspace would not be supported), which is why it is not referenced.</p> <p>The land use section has been updated to read '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>London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021.</p> <p>The following wording will be added to the land use section of this allocation:</p>	

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			<p>"Given Lambeth's location in the Central Services Area, applicants should consider 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>	
Site 22	1 & 3–11 Wellfit Street, 7–9 Hinton Road & Units 1–4 Hardess Street SE24	<p>As the site is located within Brixton CEZ LP2021 Policy E3 applies. The site allocation should refer to the requirements of Part A, specifically for affordable workspace for sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace.</p> <p>The Mayor welcomes the intention to protect existing industrial capacity. As part of the site contains undesignated industrial uses, Policy E7C of the LP2021 applies and should be reflected in the proposed allocation. Because the borough is in the CSA, there should be a greater focus on the need to provide essential services to the CAZ</p>	<p>London Plan policy E3A makes clear that planning obligations may be used to secure affordable workspace in defined circumstances set out in parts B and C of the policy. Parts B and C refer to areas and policies identified in Development Plan Documents. Lambeth's affordable workspace policy is set out at ED2 of the Lambeth Local Plan 2021. It applies to a net uplift in office floorspace in defined locations in the borough based on the viability evidence that was tested at examination. It does not apply to new light industrial floorspace because development values for that use were not found to be strong enough to justify an affordable workspace requirement. Local Plan policy ED2</p>	No further comments provided.

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		<p>in accordance with paragraph 6.4.7 of the LP2021 and this should be incorporated into the allocation. These services include sustainable last mile distribution/logistics, 'just-in-time' servicing among others.</p>	<p>would therefore not apply to the proposed approach set out in the draft site allocation for this site (a net uplift if office floorspace would not be supported), which is why it is not referenced.</p> <p>The land use section has been updated to read "light industrial workspace should be appropriate to the Brixton Creative Enterprise Zone (in accordance with London Plan Policy HC5C)."</p> <p>London Plan policy E7C relates to development proposals rather than the preparation of development plan documents. It acknowledges that sites in use as non-designated industrial land can be allocated for residential or mixed-use development, which is what is proposed in Lambeth's Draft SADPD for this site.</p> <p>London Plan paragraph 6.4.7 is noted and was fully acknowledged throughout the preparation and examination of the Lambeth Local Plan 2021.</p> <p>The following wording will be added to the land use section of this allocation: "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</p>	

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			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."	
Site 24	King's College Hospital, Denmark Hill SE5	<p>The western part of the site is part of the KIBA and therefore any intention to redevelop this area would need to be carried out as part of a masterplan for the entire Coldharbour Lane Industrial Estate in accordance with Policy E7B of the LP2021 and the Mayor's practice note on industrial intensification and co-location through plan-led and masterplan approaches.</p> <p>The Mayor welcomes the intention to continue to protect the safeguarded waste site within the allocation and any plans to relocate it should be carried out in accordance with Policy SI 9 of the LP2021 which is clear that the loss of any safeguarded waste sites will only be supported where appropriate compensatory capacity is made at or above the same level of the waste hierarchy, and should exceed the maximum achievable throughput of the site proposed to be lost. Compensatory provision should be provided ahead of the release of the original waste site.</p>	<p>The site allocations DPD is a plan-led approach, so a separate masterplan for the entire KIBA would not be necessary to meet the requirements of London Plan policy E7B.</p> <p>There is no proposal to de-designate land from the KIBA. The designation is retained in order to ensure industrial uses are safeguarded and intensified wherever possible, including as part of the hospital's activities. However, the hospital trust has a particular need to reconfigure and optimise its very constrained estate at Denmark Hill. It is a strategic healthcare provider of regional importance. This is why some additional flexibility on land uses is proposed in this small part of the KIBA that is also within the hospital's demise. This was a point emphasised by the hospital trust during the examination of the Lambeth Local Plan, resulting in a SCG between the Council and the Trust making a commitment to consider this issue further through the SADPD.</p>	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.

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			<p>Any plans to relocate the safeguarded waste use would need to be carried out in accordance with both London Plan Policy SI 9 and Lambeth Local Plan Policy EN7. The following wording will be added to the site allocation policy to make this clear:</p> <p>“Any proposal to relocate the safeguarded waste use would need to comply with the requirements of London Plan Policy SI 9 and Lambeth Local Plan Policy EN7.”</p>	

