

Lambeth Site Allocations Development Plan Document (SADPD)

Regulation 22 (1)(c) Consultation Statement

October 2024



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1. INTRODUCTION

- 1.1. This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Site Allocations Development Plan Document (SADPD) in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2. This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the SADPD has been undertaken in accordance with the relevant Regulations and Lambeth's adopted [Statement of Community Involvement \(SCI\) October 2020](#).
- 1.3. Lambeth's SCI sets the minimum requirements for engagement with the community in the formulation of planning policy documents, particularly development plan documents such as the SADPD. Details of the requirements outlined in the SCI can be found in Section 3 of this Consultation Statement (paragraphs 3.1 to 3.7).
- 1.4. The Council has prepared a separate Duty to Cooperate Statement of Compliance dated October 2024, which is published along this Consultation Statement and available in the SADPD examination library (Ref. SD 11).

Background

- 1.5. This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the SADPD, setting out how such efforts have shaped the document, and the main issues raised by representations submitted in response to statutory consultation.
- 1.6. The Council began work on the site allocation policies in late 2019 / early 2020 after the decision to prepare a SADPD separate from the revised Local Plan was made by Cabinet Members on 13 January 2020 and ratified by Full Council on 22 January 2020. This decision reflected the latest Local Development Scheme, which had been approved by delegation by the Cabinet Member for Planning Investment and New Homes in October 2019. The SADPD sought to provide detailed policies for key sites, based on a design-led and viability tested assessment of capacity.
- 1.7. The draft Site Allocations Development Plan Document (SADPD), which included site-specific policies for fourteen sites distributed across the borough, was consulted for a

period of six weeks between Monday 10 January and Tuesday 22 February 2022 (Regulation 18 consultation).

- 1.8. The representations received during this consultation were considered by Officers and informed the subsequent Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV).
- 1.9. The SADPD PSV was published in accordance with Regulation 19 for an initial eight-week representations period between Friday 8 March and Friday 3 May 2024. The representation period was re-opened for a further eight-week period from Tuesday 18 June to Tuesday 13 August 2024 to rectify an error which occurred while sending the notification email marking the start of the first representation period.
- 1.10. Of the thirteen sites included in the SADPD PSV, three have existing allocations in the Lambeth Local Plan 2021: Royal Street (Site 1); Gabriel's/Princes Wharf (Site 9) and Norwood Road (Site 18). These existing allocations will be superseded on adoption of the SADPD. The other existing allocations within the Local Plan 2021 are unaffected by the SADPD and will remain as they are in the Local Plan.
- 1.11. Once adopted, the SADPD will be part of the statutory development plan for Lambeth, alongside the [Lambeth Local Plan 2021](#), the [London Plan 2021](#) and [South Bank and Waterloo Neighbourhood Plan 2019](#).

Structure of the Consultation Statement

- 1.12. This statement of consultation comprises four sections:
 - Section 1 is an introduction.
 - Section 2 sets out the timeline which has been followed in preparing the SADPD which is in accordance with the [Local Development Scheme 2021](#).
 - Section 3 outlines the consultation process pursuant to Regulations 18 and 19 and summarises the main issues raised during the relevant consultation and how the comments received have been considered by the Council.
 - Section 4 includes two appendices supporting Section 3, which detail how consultation was undertaken, the representations made and how the comments received have been taken into account by the Council at both Regulation 18 (Appendix A) and Regulations 19/20 stages (Appendix B).

- Appendix A explains:
 - Who was invited to make representations under Regulation 18 and how they were invited to make such representations (in line with Regulation 22 (1)(c)(i) and (ii)),
 - The main issues raised by the representations made pursuant to Regulation 18 (in line with Regulation 22 (1)(c)(iii)), and
 - How any representations made pursuant to Regulation 18 have been taken into account by the Council (in line with Regulation 22 (1)(c)(iv)).
- Appendix B states:
 - Who was invited to make representations under Regulation 19 and how they were invited to make such representations,
 - The number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations (in line with Regulation 22 (1)(c)(v)), and
 - The Council's response to representations made pursuant to Regulation 20.

2. SADPD PREPARATION TIMELINE

- 2.1. The preparation of a SADPD requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the borough.
- 2.2. The below timetable outlines the main consultation stages of the draft SADPD up until the Submission date of 31 October 2024.

Key SADPD Stages Undertaken

Decision to prepare a separate Site Allocations Development Plan Document: 2019/20

- 2.3. The scope of preparing a SADPD as a separate piece of work to that of the partial review of Lambeth's Local Plan was first considered in October 2017 in light of the proposals indicated in the Housing White Paper 2017. In line with Lambeth's Local Development Scheme approved through delegation by the Cabinet Member for Planning Investment and New Homes in October 2019, Cabinet Members decided in favour of new site allocation policies to be brought forward through a subsequent SADPD separate from the Revised Local Plan (as agreed at Cabinet on 13 January 2020 and ratified by Full Council on 22 January 2020).

Draft Site Allocations Development Plan Document consultation (Regulation 18): 10 January to 22 February 2022

- 2.4. The Council consulted on a full draft version of the SADPD as well as an accompanying Sustainability Appraisal, Habitat Regulations Assessment (HRA) and related evidence for each of the sites, including flood risk evidence and design evidence. Consultation was open for a six-week period from Monday 10 January to Monday 22 February 2022.

Amendments to the Draft Site Allocations Development Plan Document: March 2022 to January 23

- 2.5. The Council considered all comments received during the Regulation 18 consultation. Site 19 – Knolly's Yard was removed from the SADPD due to significant concerns from the community. For some of the remaining thirteen sites, the boundary line was redrawn, the quantum of development, building heights and massing were reconsidered, and/or

policy wording was amended. Evidence base documents were revised and/or updated accordingly.

Site Allocations Development Plan Document Proposed Submission Version representations procedure (Regulation 19): 8 March to 3 May 2024 and 18 June to 13 August 2024

- 2.6. The Proposed Submission Version of the SADPD (SADPD PSV) was made available for a period of eight weeks from Friday 8 March to Friday 3 May 2024 for stakeholders and the public to make representations.
- 2.7. In response to a technical issue that had prevented the notification email being sent out on 8 March 2024 to reach all those who had made representations during the Regulation 18 consultation, the Regulation 19 representations period was re-opened for a further eight-week period from 18 June to 13 August 2024.
- 2.8. In accordance with regulations, Regulation 19 sought comments on the 'soundness' and legal compliance of the SADPD PSV.

Submission to the Secretary of State: 31 October 2024

- 2.9. The Council considered the comments received during Regulation 19 and considered that the Site Allocations Development Plan Document (SADPD) could be submitted for Examination in Public (EiP). The SADPD was submitted to the Secretary of State on 31 October 2024.

Examination: TBC (anticipated early 2025)

- 2.10. Timescales for the examination hearings will be set by the Planning Inspector.

Adoption: TBC (anticipated Summer 2025)

- 2.11. The SADPD is expected to be adopted in Summer 2025.

3. CONSULTATION PROCESS AND MAIN ISSUES RAISED

Lambeth's Statement of Community Involvement

- 3.1. Under the Planning and Compulsory Purchase Act 2004, the Council is required to produce a Statement of Community Involvement (SCI) setting out how and when the community and other stakeholders can be involved in the planning process, including the plan-making process.
- 3.2. Lambeth's SCI sets the minimum requirements for engagement with the community in the formulation of planning policy documents. Site Allocation Development Plan Documents are considered development plan documents and, therefore, are covered in the section of the SCI relating to statutory planning policy documents.
- 3.3. In line with the SCI, the Council is committed to engaging with statutory consultees in relation to the preparation of any development plan document, including the SADPD. As per the Town and Country Planning (Local Planning) Regulations 2012, statutory consultees include 'specific consultation bodies', 'general consultation bodies' and 'such residents or other persons carrying out business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations. A list of specific and general consultees is available in Appendix 1 of [Lambeth's Statement of Community Involvement](#).
- 3.4. The Council is also committed in meeting its legal duty to engage constructively, actively and in an on-going basis with neighbouring boroughs and a range of other agencies (refer to Appendix 1 of the SCI) to maximise the effectiveness of any development plan document. This engagement should take place while preparing and reviewing planning policies, particularly in relation to strategic priorities and cross-boundary issues.
- 3.5. The National Planning Policy Framework states that plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.
- 3.6. The Council is required to identify and engage at an early stage with all those that may be interested in the development or content of a development plan document, including those groups who may be affected by its proposals but who do not play an active part in most consultations (including groups with community engagement challenges). In order

to assist in the formulation of the consultation methodology, the Council may prepare a consultation plan.

- 3.7. The different stages of a development plan document preparation, the proposed engagement measures for each of these stages, the type of input sought for each stage and the expected outcome of the engagement exercises proposed are included in Table 1 of [Lambeth's Statement of Community Involvement](#). This table clearly sets out what is required by law in terms of consultation, as well as other measures the Council may choose to use, subject to time, resource and nature of the development plan document being prepared.

Summary of consultation pursuant to Regulation 18

- 3.8. In preparation for the Regulation 18 consultation on the draft SADPD, the Council carried out a stakeholder mapping exercise at the outset of the project to consider ways of broadening participation. In line with Regulation 18(1)(a) and Lambeth's SCI, general and specific consultation bodies, residents and other persons carrying out business in the borough generally that may be affected by the proposals in the SADPD were invited to make representations. An effort was made to also engage those who may be affected by these proposals but who do not play an active part in most consultations, including young people, people from black and minority ethnic groups and those in more disadvantaged socio-economic groups.
- 3.9. Consultation material was made available digitally via Commonplace, a digital consultation platform, while hard copies were made available at Lambeth's Civic Centre and public libraries. Engagement methods included engagement with elected politicians, online area-based meetings with representatives from community groups and organisations based in the neighbourhoods in which the Council proposed a site allocation, dedicated virtual presentations to other organisations operating in the borough, and workshops with young people.
- 3.10. Elected politicians and attendees at these briefings, meetings and workshops were encouraged to disseminate information about the consultation and raise awareness among the wider community. Other publicity and dissemination methods, including notification emails, social media posts on several platforms, and online articles and entries in digital newsletters and e-bulletins, were used to reach as broad an audience as possible.

- 3.11. Details on the Regulation 18 consultation process, including the stakeholder mapping process and the stakeholder engagement methods used, can be found in Appendix A Section 2 of this statement (Regulation 18 consultation engagement).
- 3.12. Over the course of the six-week consultation, 3,308 representations were made by 1,876 unique respondents, most of whom (96%) were individuals. Sites 18 and 19 received the most representations, with 1,317 and 1,470 representations respectively.
- 3.13. Officers analysed the content of all representations made as part of the Regulation 18 consultation. The main issues raised for each of the sites are listed in Appendix A Section 3 of this statement (Summary of Representations made pursuant to Regulation 18).
- 3.14. Officers responded individually to representations made as part of the Regulation 18 consultation.
- 3.15. Partly in response to these representations, several changes were made to the text of the SADPD. These changes also responded to recommendations made through the Sustainability Appraisal, changes to Government guidance, or updates to Lambeth's strategic documents such as the Borough Plan or the Economic Resilience Strategy. Various changes were also made to the maps.
- 3.16. A summary of the Council's response to the representations made pursuant to Regulation 18 and key changes made to the SADPD is included in Appendix A Section 4 of this statement.

Summary of representations procedure pursuant to Regulation 19

- 3.17. In line with Regulation 19, each of the general consultation bodies and specific consultation bodies invited to make representations under Regulation 18 were made aware that the SADPD Proposed Submission Version (PSV) was available for inspection and were sent a copy of the statement of the representations procedure. This included those who had submitted representations as part of the Regulation 18 consultation.
- 3.18. Similarly to the Regulation 18 consultation process, relevant documents were made available digitally, this time on a dedicated webpage hosted on Lambeth's website, while hard copies were made available at Lambeth's Civic Centre and public libraries.

- 3.19. Engagement methods included meetings with ward councillors and Members of Parliament for the three constituencies falling within Lambeth's boundary, and online area briefings with representatives from community groups and organisations. Elected politicians and attendees at these area briefings were encouraged to disseminate information about the Regulation 19 representations procedure to the wider community.
- 3.20. Beyond the notification email the Council sought to broaden the range of stakeholders involved by using other publicity and dissemination methods such as social media posts and online articles, which were published on Lambeth-wide e-bulletins.
- 3.21. The table below (Table 1) illustrates the timeline of stakeholder engagement events, and publicity and dissemination actions taken by the Council as part of Regulation 19 consultation.

Table 1. Regulation 19 representations procedure - Engagement timeline

Date	Form of engagement	Audience
8 November 2023	Informal Cabinet Members meeting	Cabinet Members
16 November 2023	Planning Policy Liaison Forum (PPLF) meeting	Ward Councillors that would otherwise not be involved in planning policy related decision-making
24 November 2023	West Norwood ward Councillors briefing	Ward Councillors of the three wards converging in the proximity of Sites 18 and 19 (Knight's Hill, West Dulwich and St Martin's wards)
13 December 2023	MPs offered a briefing session on the SADPD PSV	Members of Parliament for the three constituencies falling within Lambeth's boundary before the 2024 general election
9 January 2024	Briefing with MP Helen Hayes	Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative)
8 March 2024	Representations period opens - Notification email	General consultation bodies and specific consultation bodies that were invited to make representations under Regulation 18(1) and intended to those who submitted representations as part of the Regulation 18 consultation
8 March 2024	Hard copies of key submission documents made available for inspection at libraries 'Have your Say' and dedicated SADPD webpages made live Social media post on X (formerly Twitter)	General public

Date	Form of engagement	Audience
12 March 2024	'Have your Say' email notification	General public
15 March 2024	Social media posts on X, Facebook and Nextdoor	General public
22 March 2024	Social media post on LinkedIn Online article on Love Lambeth newsletter	General public
24 March 2024	Social media post on X	General public
2 April 2024	Social media post on X	General public
9 April 2024	Online area briefing session: West Norwood	Representatives from community groups and organisations based in West Norwood and local elected politicians
10 April 2024	Online area briefing session: Brixton and Loughborough Junction	Representatives from community groups and organisations based in Brixton and Loughborough Junction and local elected politicians
11 April 2024	Online area briefing session: Kennington	Representatives from community groups and organisations based in Kennington and local elected politicians
11 April 2024	Social media post on Facebook	General public
15 April 2024	Online area briefing session: Waterloo	Representatives from community groups and organisations based in Waterloo and local elected politicians
18 April 2024	West Norwood ward Councillors briefing	Ward Councillors of the three wards converging in the proximity of Sites 18 and 19 (Knight's Hill, West Dulwich and St Martin's wards)
22 April 2024	Briefing with MP Helen Hayes	Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative)
22 April 2024	Social media post on X	General public
26 April 2024	'Have your Say' email notification	General public
30 April 2024	Notification email	General consultation bodies and specific consultation bodies that were invited to make representations under Regulation 18(1) and intended to those who submitted representations as part of the Regulation 18 consultation
30 April 2024	Social media post on LinkedIn	General public
1 May 2024	Social media posts on X, Facebook and Nextdoor	General public
3 May 2024	Representations period closes Hard copies of key submission are removed from display at libraries	General public

Date	Form of engagement	Audience
	'Have your Say' and dedicated SADPD webpages are updated to state representations period has closed	
18 June 2024	Representations period re-opens Notification email Hard copies of key submission documents made available for inspection at libraries Dedicated SADPD webpage is updated to state representations period has been re-opened	General consultation bodies and specific consultation bodies that were invited to make representations under Regulation 18(1) and all those who submitted representations as part of the Regulation 18 consultation
13 August 2024	Representations period closes Hard copies of key submission are removed from display at libraries Dedicated SADPD webpages updated to state representations period has closed	General consultation bodies and specific consultation bodies that were invited to make representations under Regulation 18(1) and all those who submitted representations as part of the Regulation 18 consultation

3.22. Further detail on the stakeholder mapping for the Regulation 19 representations procedure and the methods used to engage with such stakeholders can be found in Appendix B Section 2 of this statement (Regulation 19 representations engagement).

3.23. The representations procedure was open for two eight-week periods, from 8 March to 3 May 2024 and 18 June to 13 August 2024. During this time, 322 representations were made by 292 respondents, most of whom (83.9%) were individuals. Sites 18 and 20 received the most representations, with 68 and 113 representations respectively.

3.24. Officers processed these representations and identified key issues raised for each of the 13 sites included in the SADPD PSV. Key information about the nature of the representations received along with a list of the main issues raised are available in Appendix B Section 3 of this statement (Summary of representations made pursuant to Regulation 20).

3.25. The Council has responded to each of the key issues identified in the representations received. Any changes proposed to the SADPD as a result of representations received are outlined in the Schedule of Proposed Modifications that has been published alongside this Consultation Statement and is available in the examination library (Ref. SD 03).

4. APPENDICES

APPENDIX A. CONSULTATION PURSUANT TO REGULATION 18

Introduction

- A.1.1. The Council published the Draft Site Allocations Development Plan Document (SADPD) for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on 10 January 2022. The Draft SADPD consultation was open for six weeks until 22 February 2022.
- A.1.2. A Consultation and Engagement Plan for Regulation 18 consultation consistent with Lambeth's Statement of Community Involvement was agreed by the Council on 13 December 2021. Section 2 of this appendix (Regulation 18 consultation engagement) states who was invited to make representations as part of the Regulation 18 consultation and what engagement methods were used to publicise the consultation process. This section meets the requirements set by Regulation 22(1)(c) (i) and (ii).
- A.1.3. A total of 3,308 representations by 1,876 unique respondents were made over the course of the six-week consultation. A summary of the main issues raised is included in Section 3 of this appendix (Summary of representations made pursuant to Regulation 18). This section meets the requirements set by Regulation 22(1)(c)(iii).
- A.1.4. Section 4 outlines the Council's response to representations made pursuant to Regulation 18 and sets out how they have been taken into account. This section meets the requirements set by Regulation 22(1)(c)(iv).

Regulation 18 consultation engagement

Stakeholder mapping

- A.2.1. Stakeholder mapping is the process by which the characteristics and attributes of the different stakeholders linked to a project are identified and analysed.
- A.2.2. The stakeholder mapping for the Regulation 18 consultation was undertaken at the outset of the project to enable the Council to consider ways of broadening participation from all members of the community. The key stakeholders identified for the Regulation 18 consultation were:

- Those who live, work and carry out business in Lambeth,
- Tenants and leaseholders,
- Residents' associations,
- Community and voluntary groups,
- Elected politicians,
- Neighbourhood planning groups (existing and emerging),
- Business Improvement Districts (BIDs) and business networks,
- Developers and landowners (and their representatives),
- Registered providers of affordable housing,
- Infrastructure providers (such as transport or health services), and
- Statutory consultees such as the Mayor of London, other London boroughs, Historic England, Environment Agency, and Natural England.

A.2.3. In order to assess the potential equalities impact of the approach to consultation, the level of engagement of these stakeholder groups was evaluated. It was concluded that the stakeholder groups could be classified in three categories according to their level of engagement; 'active', 'aware and potentially active' and 'groups with whom the Council has struggled to engage in the past'. Table A.1 below sets out the results of this initial assessment:

Table A.1. Stakeholder mapping

Audience characteristics	Audience attributes	Stakeholders	Engagement/publicity method
Active	<ul style="list-style-type: none"> • Likely to be identified consultees (general, specific or other) • Established interest in planning and regeneration issues • Likely to be members of community organisations • Have a sense of belonging to their neighbourhood • Follow and/or are aware of various Council initiatives 	<ul style="list-style-type: none"> • Politicians • Neighbourhood planning groups • Interest groups, e.g. Lambeth 500 • Developers and landowners • Registered providers of affordable housing • Infrastructure and service providers • Statutory consultees 	<ul style="list-style-type: none"> • Notification by email and through bulletins/networks • Briefing for ward Councillors • Meetings with neighbourhood planning groups and BIDs • Presentation to Lambeth Housing Partnership • Meetings with statutory consultees and service providers (where appropriate)
Aware and potentially active	<ul style="list-style-type: none"> • Likely to read newsletters, Council website, tweets etc • Easy to inform but not so easy to involve – 	<ul style="list-style-type: none"> • Tenants' and Residents' Associations • Community and voluntary groups 	<ul style="list-style-type: none"> • Notification by email and through bulletins/networks • Promotion in Council publications

	maybe don't have the time or we don't provide the right opportunity <ul style="list-style-type: none"> • Might engage if we are in the right place or offer the right forum • Limited knowledge of planning and regeneration issues • Might rally around a single issue 	<ul style="list-style-type: none"> • Special interest groups or networks • Businesses and business networks 	<ul style="list-style-type: none"> • Promotion by ward Councillors
Groups with whom the Council has struggled to engage in the past	<ul style="list-style-type: none"> • Do not normally read the literature that the Council sends • Think that what the Council says does not directly affect them • Limited knowledge of planning and regeneration issues • May not speak English as a first language • May not feel they have much of a stake in their local community (e.g., young people, people who have just moved into the area) 	<ul style="list-style-type: none"> • Residents not involved in groups or networks • Those in more disadvantaged socio-economic groups • Some older people • Some young people • Some disabled people • Some black and minority ethnic groups 	<ul style="list-style-type: none"> • Promotion by ward Councillors • Use of social media channels • Publicity through the Youth Council and bulletins targeting young people • Meeting with groups representing people with disabilities and young people • All consultation material to include detail of support available in libraries

A.2.4. An Equalities Impact Assessment (EqIA) of the consultation and engagement plan was carried out alongside the EqIA of the Draft SADPD. This can be found in Appendix B of the [Regulation 18 Consultation Report](#) available in the examination library (Ref. SUP 13). The EqIA confirms the SADPD will likely result in generally positive impacts on different protected groups in Lambeth.

Stakeholder engagement methods

Commonplace

A.2.5. The primary method for seeking stakeholders' views at Regulation 18 consultation was Commonplace, a digital consultation platform used by the Council at the time. The platform is designed to be easy to access on smartphones and tablets to encourage wider community participation.

A.2.6. The Commonplace site presented an overview of the sites in map form, allowing stakeholders to select the site(s) they were interested in rather than reading through lengthy documents. Details of each site were provided individually, including an aerial photograph and its boundary, the vision for the site and maps showing the context

and proposed approach, as well as draft policy wording. Links to relevant sections of the supporting evidence and the SustA were also available.

- A.2.7. In addition to site specific information, a general section included information on the background of the SADPD and its preparation process, set out what people were being asked to comment on in this round of consultation and how the results of the consultation would be considered and reported on.
- A.2.8. A series of questions invited responses on the content of the Draft SADPD and on the proposed approach to each site.
- A.2.9. The Commonplace site made clear that representations could also be made in writing by email or by post and that all responses received would be considered equally, irrespective of the medium used.
- A.2.10. As far as possible, the introductory material for the consultation was written in plain English, avoiding technical jargon wherever possible. However, the use of technical language was considered necessary for certain parts of draft policies and supporting evidence (for example, in relation to flood risk levels or categorisation of heritage assets) in order to convey the correct meaning in a statutory planning context.
- A.2.11. Screenshots showing how the material was presented on the Commonplace platform are included in Appendix C of the [Regulation 18 Consultation Report](#) (Ref. SUP 13 in the examination library).
- A.2.12. The following supplementary engagement methods were used:

Engagement with ward Councillors

- A.2.13. Cabinet approved the Draft SADPD for consultation pursuant to Regulation 18 and the approach to this consultation on 13 December 2021. Alongside this Cabinet decision, a series of meetings were held to brief ward Councillors with allocated sites in or nearby their wards. These meetings were held virtually on 8, 9 and 16 December 2021, in line with Government guidance on the COVID-19 pandemic. These meetings gave ward Councillors a chance to consider the material and provided them with the information necessary to support their residents in accessing the consultation material.
- A.2.14. Ward Councillors were also invited to the area-based meetings, discussed in paragraphs A.2.17 and A.2.18 of this appendix.

Engagement with local MPs

A.2.15. Three parliamentary constituencies fell within Lambeth's boundary at the time the Regulation 18 consultation was held. The three MPs of these constituencies were offered briefing sessions with Council officers on the content of the Draft SADPD consultation. They were also invited to the area-based meetings discussed in paragraphs A.2.17 and A.2.18 of this report. Those MPs who attended a briefing were also asked to disseminate information about the consultation to their constituents.

A.2.16. The following MP briefings took place:

- Florence Eshalomi MP (21st January 2022)
- Bell Ribeiro-Addy MP (1st February 2022)

Area meetings

A.2.17. Meetings were held with representatives from community groups and organisations based in the six Lambeth neighbourhoods in which the Council proposed a site allocation in the Draft SADPD. Ward Councillors and MPs were also invited. A full list of the invitees and attendees is set out in Table A.2.

Table A.2. 2022 Area Meetings Invitees and Attendees

Area (date)	Invitees	Attendees
West Norwood (24 January 2022)	<ul style="list-style-type: none">• Cllr Jackie Meldrum, Knight's Hill ward Councillor (Labour and Co-operative);• Cllr Jane Pickard, Knight's Hill ward Councillor (Labour and Co-operative);• Cllr Sonia Winifred, Knight's Hill ward Councillor (Labour and Co-operative);• Cllr Fred Cowell, Thurlow Park ward Councillor (Labour and Co-operative);• Cllr Anna Birley, Thurlow Park ward Councillor (Labour and Co-operative);• Cllr Peter Ely, Thurlow Park ward Councillor (Labour and Co-operative);• Cllr Liz Atkins, Streatham Hill ward Councillor (Labour and Co-operative);• Cllr Rezina Chowdhury, Streatham Hill ward Councillor (Labour and Co-operative);	<ul style="list-style-type: none">• Cllr Matthew Bennett, Gipsy Hill ward Councillor (Labour and Co-operative);• Cllr Jane Pickard, Knight's Hill ward Councillor (Labour and Co-operative)• Chair of Norwood Planning Assembly;• Chair of Norwood Forum;• Treasurer of Norwood Forum;• BID Manager for Station to Station;• Chair of Norwood Action Group

Area (date)	Invitees	Attendees
	<ul style="list-style-type: none"> • Cllr Iain Simpson, Streatham Hill ward Councillor (Labour and Co-operative); • Cllr Matthew Bennett, Gipsy Hill ward Councillor (Labour and Co-operative); • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Norwood Planning Assembly • Norwood Forum • Station to Station BID • Norwood Action Group 	
Kennington (26 January 2022)	<ul style="list-style-type: none"> • Cllr David Amos, Prince's ward Councillor (Labour and Co-operative); • Cllr Jon Davies, Prince's ward Councillor (Labour and Co-operative); • Cllr Joanne Simpson, Prince's ward Councillor (Labour and Co-operative) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Kennington, Oval and Vauxhall Neighbourhood Forum • Stop the Blocks Community Action Group 	<ul style="list-style-type: none"> • Cllr David Amos, Prince's ward Councillor (Labour and Co-operative); • Cllr Jon Davies, Prince's ward Councillor (Labour and Co-operative); • Cllr Joanne Simpson, Prince's ward Councillor (Labour and Co-operative) • Two representatives from Stop the Blocks Community Action Group; • Acting Chair of Kennington, Oval and Vauxhall Neighbourhood Forum
Loughborough Junction (31 January 2022)	<ul style="list-style-type: none"> • Cllr Jim Dickson, Herne Hill ward Councillor (Labour and Co-operative); • Cllr Pauline George, Herne Hill ward Councillor (Labour and Co-operative); • Cllr Rebecca Thackray, Herne Hill ward Councillor (Green Party); • Cllr Matthew Bennet, Gipsy Hill ward Councillor (Labour and Co-operative) • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) <p>Nominated representatives from:</p>	<ul style="list-style-type: none"> • Cllr Pauline George, Herne Hill ward Councillor (Labour and Co-operative); • Cllr Rebecca Thackray, Herne Hill ward Councillor (Green Party) • Chair of Loughborough Junction Action Group; • Representative from Loughborough Junction Action Group; • Chair of Herne Hill Forum; Representative from Metaform Architects; • Chair of Herne Hill Society

Area (date)	Invitees	Attendees
	<ul style="list-style-type: none"> • Loughborough Junction Action Group • Herne Hill Society • Herne Hill Forum 	
Brixton (3 February 2022)	<ul style="list-style-type: none"> • Cllr Scarlett O'Hara, Coldharbour ward Councillor (Labour and Co-operative); • Cllr Donatus Anyanwu, Coldharbour ward Councillor (Labour and Co-operative); • Cllr Emma Nye, Coldharbour ward Councillor (Labour and Co-operative); • Cllr Martin Tiedemann, Brixton Hill ward Councillor (Labour and Co-operative); • Cllr Maria Kay, Brixton Hill ward Councillor (Labour and Co-operative); • Cllr Adrian Garden, Brixton Hill ward Councillor (Labour and Co-operative); • Cllr Irfan Mohammed, Ferndale ward Councillor, (Labour and Co-operative); • Cllr Joshua Lindsey, Ferndale ward Councillor (Labour and Co-operative); • Cllr Jessica Leigh, Ferndale ward Councillor (Labour and Co-operative); • Cllr Matthew Bennett, Gipsy Hill ward Councillor (Labour and Co-operative) <p>Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative);</p> <p>Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative);</p> <p>Bell Ribeiro-Addy MP, MP for Streatham (Labour and Co-operative)</p> <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Brixton Society • Brixton BID • Brixton Neighbourhood Forum 	<ul style="list-style-type: none"> • Cllr Scarlett O'Hara, Coldharbour ward Councillor (Labour and Co-operative); • Cllr Adrian Garden, Brixton Hill ward Councillor (Labour and Co-operative); • Cllr Maria Kay, Brixton Hill ward Councillor (Labour and Co-operative) • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) <p>Representatives from:</p> <ul style="list-style-type: none"> • Brixton Society; • BID Director of Brixton BID
Streatham (8 February 2022)	<ul style="list-style-type: none"> • Cllr Malcolm Clark, Streatham Wells ward Councillor (Labour and Co-operative); • Cllr Marianna Masters, Streatham Wells ward Councillor (Labour and Co-operative); 	<ul style="list-style-type: none"> • Cllr Malcolm Clark, Streatham Wells ward Councillor (Labour and Co-operative) • Office Manager to Bell Ribeiro-Addy

Area (date)	Invitees	Attendees
	<ul style="list-style-type: none"> • Cllr Mohammed Seedat, Streatham Wells ward Councillor (Labour and Co-operative); • Cllr Matthew Bennett, Gipsy Hill ward Councillor (Labour and Co-operative) • Bell Ribeiro-Addy MP, MP for Streatham (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Streatham Action • InStreatham BID • Local businesses on the Parade 	<ul style="list-style-type: none"> • BID Manager of InStreatham BID
Waterloo (10 February 2022)	<ul style="list-style-type: none"> • Cllr Kevin Craig, Bishop's ward Councillor (Labour and Co-operative); • Cllr Ibrahim Dogus, Bishop's ward Councillor (Labour and Co-operative); • Cllr Jennie Mosley, Bishop's ward Councillor (Labour and Co-operative) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • WeAreWaterloo BID • South Bank and Waterloo Neighbours (SoWN) neighbourhood forum • South Bank Employers' Group • Waterloo Development Community Group • Coin Street Community Builders • Jubilee Gardens Trust 	<ul style="list-style-type: none"> • Two representatives from SoWN; • Chief Executive of South Bank Employers' Group; • Planning agent from Carney Sweeney, on behalf of Coin Street Community Builders; • Group Director of Coin Street Community Builders; • Chair of Jubilee Gardens Trust; • Director of Waterloo Development Community Group

A.2.18. These meetings were held virtually in line with Government guidance on the COVID-19 pandemic. These meetings gave community representatives the opportunity to consider the consultation material, ask questions and express their views. The representatives were also encouraged to disseminate information about the consultation to the wider community.

Presentations

A.2.19. In addition to the above, Council Officers also delivered a number of virtual presentations during the Regulation 18 consultation to increase awareness and

participation. This included information about the consultation, as well as some relevant example sites to put the material in context. There was also an opportunity to ask questions during these sessions. Participants were directed to the formal channels (i.e., the Commonplace webpage, email and postal address) to make comments. Presentations were delivered to:

- Lambeth Forums Network (13 January 2022)
- Lambeth Staying Healthy Partnership Board (18 January 2022)
- Mosaic Clubhouse (19 January 2022)
- Lambeth Safer Spaces working group (20 January 2022)
- Guy's and St Thomas' Hospital (28 January 2022)
- Lambeth Housing Partnership (28 January 2022)
- WeAre336 (28 January 2022)
- Organisations representing disabled people (2 February 2022)

A British Sign Language (BSL) interpreter and closed captioning were provided to ensure the session was accessible. The following organisations were invited to attend: Action on Disability; Action on Hearing Loss; Age UK Lambeth; Alliance for Inclusive Education; Alzheimer's Society; Carers Hub; Cherry Groce Foundation; Community Support Network South London; Cycling Without Age; Disability Advice Service Lambeth; Disability Rights UK; Family Action; Healthwatch Lambeth; Inclusion London; Independent Lifestyle Options; Lambeth and Southwark Mind; Lambeth Parent Forum; L'Arche; Lifelong Family Links; Mencap; Mosaic Clubhouse; National Autistic Society; People First; Pocklington Trust; Royal Association for Deaf People; Royal London Society for Blind People; Share Community; Social Integration Commission; Transport for All; We Are 336; Wheels for Well-Being

- Black-led organisations (22 February 2022)

Arranged through black-led organisation, the Mending Room, Council officers met with three local community organisers to discuss the Draft SADPD in the context of anti-racist urban design.

Workshops with Young People

- A.2.20. Young people were identified as a group with whom the Council had struggled to engage with in the past. Typically, the Under 25s are the least represented age category in public consultations on planning policy in Lambeth.
- A.2.21. In order to seek the views of young people, a number of workshops to discuss the document were held. These workshops were facilitated by ZCD Architects, who specialise in youth engagement. Three areas were chosen for workshops due to the clusters of sites making it easier for the group to travel between sites during the sessions.
- A.2.22. The following workshops took place:
- Waterloo (12 February 2022)

12 participants aged approximately 13-18 years old attended from Coin Street Community Builders, Big Kid Foundation and Bright Centres. Sites 8 and 9 were visited and discussed.
 - Brixton (14 February 2022)

15 participants aged approximately 10-19 years old attended from CEF Lyncx. Sites 20 and 21 were visited and discussed.
 - West Norwood (14 February 2022)

6 participants aged approximately 11-17 attended from the Rathbone Society. Sites 18 and 19 were visited and discussed.
- A.2.23. Lambeth Youth Council were also invited to attend the workshops through the Youth Council co-ordinator.
- A.2.24. Feedback from the workshops is included in Appendix H of the [Regulation 18 Consultation Report](#), available in the examination library (Ref. SUP 13).

Publicity and dissemination

- A.2.25. A wide range of methods were used to raise awareness about the consultation and to encourage people to respond. The publicity methods aimed to target the full range of stakeholders, including those who had been characterised as ‘un-engaged’ or ‘harder to engage’.

A.2.26. In addition to more traditional publicity methods, ward Councillors, community groups and networks were encouraged to raise awareness about the consultation through word of mouth and ‘cascading’ amongst their constituents and members.

Notification email

A.2.27. A notification email was sent to all those on Lambeth’s Planning Policy consultation database when the consultation went live on 10 January 2022. This consisted of approximately 2,050 contacts, including the statutory, specific and general consultation bodies required by the regulations. The landowners and their representatives for the proposed sites were also contacted via this notification email. An additional list of community stakeholders who had recently engaged in consultations collated from colleagues in the Sustainable Growth and Opportunity Directorate was also notified.

Social media

A.2.28. The Council publicised details of the consultation on their social media accounts, which include X (formerly known as Twitter), Facebook, LinkedIn and Nextdoor. Screenshots of this publicity can be seen in Appendix D of the [Regulation 18 Consultation Report](#), available in the examination library (Ref. SUP 13).

A.2.29. Between 9 February and 22 February 2022, Commonplace also ran a targeted social media campaign to raise awareness of the consultation. Advertisements were placed on Facebook and Instagram and targeted those living in Lambeth. These sponsored posts were viewed by 19,926 users, 2,025 of whom visited the SADPD Commonplace site directly from the adverts. 25 representations were made on Commonplace by users who saw and engaged with the adverts.

Press release

A.2.30. A [blog post](#) was published as a press release on Love Lambeth on 2nd February. The blog post explained the purpose of the consultation, how to view the material and how to submit representations. A copy of the post can be found in Appendix E of the [Regulation 18 Consultation Report](#), available in the examination library (Ref. SUP 13).

Newsletters

A.2.31. To reach a wider range of stakeholders, the consultation was publicised in a number of online newsletters/e-bulletins. Publication information included a link to the online consultation material and contact details for the Planning Policy team for further questions. This publicity was included in the following newsletters:

- Lambeth Biodiversity Forum (17 January 2022)
- Lambeth First (18 January 2022)
- Lambeth Schools Partnership (19 January 2022)
- Lambeth 500 (24 January 2022)
- Lambeth Climate Action, Clean Transport and Sustainability News (3 February 2022)
- Coldharbour Community Early Help Update (9 February 2022)

A.2.32. Furthermore, publicity to attract additional participants to the workshop with young people was included in the Youth and Play e-bulletin on 28 January 2022. Screenshots of these newsletters are set out in Appendix F of the [Regulation 18 Consultation Report](#).

A.2.33. Local community-led organisations were also encouraged to publicise the consultation in their newsletters. This was done via community groups and Business Improvement Districts (BIDs).

Integrate

A.2.34. At the time of the Regulation 18 consultation Lambeth was subscribed to Integrate, a directory of voluntary, community and social enterprise sector organisations that operate in the borough. A notification email was sent to the 1,141 groups in Integrate's network on 13 January 2022. This email explained the purpose of the consultation and how to respond. The email was viewed 1,501 times. A copy of the email is available in Appendix G of the [Regulation 18 Consultation Report](#).

Libraries

A.2.35. Physical copies of the Draft SADPD and draft SustA were displayed in all of Lambeth's ten public libraries. Copies were also available to view by appointment at Lambeth Civic Centre.

A.2.36. Librarians were informed on how to provide assistance to those not confident navigating the consultation material or submitting representations.

Website

A.2.37. Information about the consultation was included in a dedicated webpage on the Council's website. The consultation was also featured on the homepage of the Council's website, under the 'Have Your Say' section. Both webpages had a link to the Commonplace site and information on how to respond to the consultation. Screenshots of the webpage are set out in Appendix H of the [Regulation 18 Consultation Report](#), available in the examination library (Ref. SUP 13).

Summary of representations made pursuant to Regulation 18

Response to Regulation 18 consultation

A.3.1. Over the course of the six-week consultation, 3,308 representations were made by 1,876 respondents.

A.3.2. The majority of respondents (1,329) made representations by email, while the rest (547) made representations on Commonplace. This equates to 1,493 representations submitted by email and 1,815 made on Commonplace. Table A.3 below shows the number of representations made per site. Site 18 and Site 19 received the most representations, with 1,317 and 1,470 representations made respectively.

Table A.3. Number of representations made pursuant to Regulation 18 per proposed site

Site allocation	Site name	Total number of representations	Percentage
Site 1	Royal Street SE1	20	0.6%
Site 2	St Thomas' Hospital SE1	10	0.3%
Site 3	35-37 and Car Park Leigham Court Road SW16	78	2.4%
Site 7	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11	164	5.0%
Site 8	110 Stamford Street SE1	10	0.3%
Site 9	Gabriel's Wharf and Princes Wharf, Upper Ground SE1	11	0.3%
Site 17	330-336 Brixton Road SW9	14	0.4%

Site allocation	Site name	Total number of representations	Percentage
Site 18	286-362 Norwood Road SE27	1,317	39.8%
Site 19	Knolly's Yard SW16 (now removed from SADPD)	1,470	44.4%
Site 20	Tesco, 13 Acre Lane SW2	85	2.6%
Site 21	51-65 Effra Road SW2	63	1.9%
Site 22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24	35	1.1%
Site 23	Land at corner of Coldharbour Lane and Herne Hill Road SE24	20	0.6%
Site 24	King's College Hospital, Denmark Hill SE5	11	0.3%

A.3.3. In addition to those 3,308 representations made on the sites included in the Draft SADPD, 17 representations were made proposing new sites to be included in the next iteration of the SADPD. A detailed response to these representations is included in Appendix J of the [Regulation 18 Consultation Report](#).

A.3.4. The majority of the consultation respondents were individuals (96%). Table A.4 below provides a breakdown of the organisations that responded to the Regulation 18 consultation by type.

Table A.4. Organisations responding to Regulation 18 consultation by type

Type (number of responses received)	Respondent
Affordable housing provider (2)	<ul style="list-style-type: none"> • Savills on behalf of Notting Hill Genesis • Metropolitan Thames Valley
Business (11)	<ul style="list-style-type: none"> • Unnamed business owner (x3) • Natwest, Streatham Branch • Lambeth Co-operative Development Agency • Iceland Norwood Road Branch • Leaseholder • Portobello Brewery (freeholder 1) • Portobello Brewery (freeholder 2) • West Norwood Service Station
Business improvement district (2)	<ul style="list-style-type: none"> • Station to Station BID • inStreatham BID
Community group (12)	<ul style="list-style-type: none"> • Mosaic Clubhouse • Friends of Hillside Gardens Park • Norwood Society • Herne Hill Society • Mums for Lungs

Type (number of responses received)	Respondent
	<ul style="list-style-type: none"> • Friends of West Norwood Cemetery • Brixton Society • Knolly's Yard Community Group • Norwood Forum • Norwood Action Group • Streatham Action • Waterloo Community Development Group
Developer / landowner (21)	<ul style="list-style-type: none"> • Brixton Unitarian Church • Landowner (anonymous) • Agent on behalf of LPPI Real Estate Fund • Rolfe Judd on behalf of Union Jack Club • BNPP on behalf of Marlin Apartments • Gerald Eve on behalf of Stanhope PLC • Carney Sweeney on behalf of Coin Street Community Builders • ID Planning on behalf of King's College Hospital Foundation Trust • DP9 on behalf of MEC London Property 3 Ltd • Savills on behalf of Guy's and St Thomas' Foundation • WSP on behalf of GSTT • Savills on behalf of Harris Housing • Transport for London Commercial Development • Icenii on behalf of Telereal Trillium and Arch Company • Daniel Watney on behalf of Ecoworld • Montagu Evans on behalf of HSBC • DP9 on behalf of Bourne Capital • DP9 on behalf of London Heights • DP9 on behalf of Leos International • Lambeth Accord • Planning Potential on behalf of Aldi Stores Ltd
Elected politician (9)	<ul style="list-style-type: none"> • Councillor for Princes ward (Labour) • Councillor for Coldharbour ward (Labour and Co-operative) • MP for Dulwich and West Norwood (Labour and Co-operative) • Candidates for St Martin's ward (Labour and Co-operative) • Councillors for Knight's Hill ward • Councillors for Thurlow Park ward and candidates for West Dulwich ward • Councillor for Tulse Hill • Lambeth Green Group • Labour and Co-operative Assembly Member
Infrastructure provider (2)	<ul style="list-style-type: none"> • Thames Water • Avison Young on behalf of National Grid
Lambeth partnerships (1)	<ul style="list-style-type: none"> • Lambeth Health and Wellbeing Partnership
Neighbourhood Planning Forum (3)	<ul style="list-style-type: none"> • South Bank & Waterloo Neighbours • Kennington, Oval and Vauxhall Neighbourhood Forum • Norwood Planning Assembly

Type (number of responses received)	Respondent
Other local authorities (2)	<ul style="list-style-type: none"> • Surrey County Council, Minerals and Waste Planning Policy Team • Gloucester County Council, Minerals and Waste Planning Authority
Other statutory consultees (8)	<ul style="list-style-type: none"> • Coal Authority • Natural England • Sports England • Transport for London • Historic England • Greater London Authority • Environment Agency
Tenants' / residents' associations (TRAs) (6)	<ul style="list-style-type: none"> • Lancaster Avenue Residents' Association • Greenham Close TRA • Thurlow Towers Residents' Association • Residents of Vale Living Retirement Village • Residents of Baytree Road and Porden Road • Mulberry Housing Co-op
Total (79)	

A.3.5. Those who responded via the Commonplace platform were asked optional questions about their demographic characteristics. Note representations received via email (representations from 71% of the respondents) did not include any information on demographic characteristics. Therefore, the data collected refers to a minority of respondents, those of the Commonplace platform respondents that opted to provide demographic information as part of their response. The data collected is presented in Section 3 of the [Regulation 18 Consultation Report](#).

Main issues raised in representations

A.3.6. Officers analysed the content of all representations made as part of the Regulation 18 consultation for each of the 14 sites. Summary tables providing an overview of the nature of the representations received are included in Section 4 of the of the [Regulation 18 Consultation Report](#) (Ref. SUP 13 in the Examination Library).

Council's response to representations made pursuant to Regulation 18 and key changes to the SADPD PSV

A.4.1. Officers responded individually to all 3,308 representations made in the course of the Regulation 18 consultation. These responses are appended to the [Regulation 18 Consultation Report](#) (Appendix K), which is one of the supporting documents the council published along the key proposed submission documents under Regulation

19 and has been made available in the examination library with the reference SUP 13.

A.4.2. The key changes made to the SADPD for each of the proposed site allocations are summarised in Table A.5 below (please note the table does not include minor changes such as typos).

Table A.5. Summary of key changes to SADPD

Site No.	Site address	Proposed changes
Site 1	Royal Street SE1	<ul style="list-style-type: none"> • The site area corrected from 7.2ha to 2.32ha. • Building heights and locations amended to address Historic England concerns regarding impact on World Heritage Site. • No significant change to other development principles.
Site 2	St Thomas' Hospital SE1	<ul style="list-style-type: none"> • Site extended west to better facilitate development within the hospital estate. • Building heights and locations amended to address impact on World Heritage Site. • Policy wording updated to require development to be set back from the roadside to address stakeholders concerns regarding cumulative impact of development. • No significant change to other development principles.
Site 3	35 – 37 and Car Park Leigham Court Road SW16	<ul style="list-style-type: none"> • Reduction in the number of residential units proposed (from 30-35 units to 25-30 units). • No significant change to other development principles.
Site 7	6 – 12 Kennington Lane and Wooden Spon House, 5 Dugard Way SE11	<ul style="list-style-type: none"> • Minor change to site boundary to reflect land registry ownership details. • Reduction in the number of residential units proposed (from 135-145 units to 115-125 units). • No significant change to other development principles.
Site 8	110 Stamford Street SE1	<ul style="list-style-type: none"> • Reduction in the number of residential units proposed (from 30-40 units to 30 units). • No significant change to other development principles.
Site 9	Gabriel's Wharf and Princes Wharf, Upper Ground SE1	<ul style="list-style-type: none"> • Policy worded updated to allow for an element of extra care housing where need is demonstrated. • No significant change to development principles.
Site 17	330 – 336 Brixton Road SW9	<ul style="list-style-type: none"> • Reduction in the number of residential units proposed (from 70-75 units to 60-70 units). • No significant change to other development principles.
Site 18	286 – 362 Norwood Road SE27	<ul style="list-style-type: none"> • Significant local opposition to principle and scale of development.

		<ul style="list-style-type: none"> • Site boundary amended to reduce scale of allocation and exclude existing housing at northeast corner and southwest corner as well as the 'laundry' site which had an extant permission that was being implemented. • Reduction in the number of residential units proposed (from 390-470 units to 150-170 units). • Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000-4,000 sqm. The newly proposed quantum is to include at least 1,123 sqm GLA light industrial workspace in order to achieve no net loss of existing industrial floorspace capacity. • Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met, e.g. public benefits are achieved. • No significant change to other development principles.
Site 19	Knolly's Yard SW16	<ul style="list-style-type: none"> • Significant local opposition to principle and scale of development. • Non-conformity issue with the London Plan raised by the GLA. • Site no longer proposed for allocation.
Site 20	Tesco, 13 Acre Lane SW2	<ul style="list-style-type: none"> • Minor amendment to site boundary. • Proposed quantum of residential development increased (from 120-170 units to 180-210 units). • No significant change to other development principles.
Site 21	51-65 Effra Road SW2	<ul style="list-style-type: none"> • Site boundary amended to remove Fitch Court, Brixton Unitary Church and Mosaic Centre. • Reduction in the number of residential units proposed (from 200-240 units to 85-95 units). • No significant change to other development principles.
Site 22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24	<ul style="list-style-type: none"> • Indicative servicing location amended to be on the servicing route within the site (rather than on Hardess Street). • Proposed pedestrian link with Higgs through railway arch removed. • Reduction in the number of residential units proposed (from 70-90 units to 50-70 units). • Policy wording added related to the development implications for trees. • No significant change to other development principles.
Site 23	Land at corner of Coldharbour Lane and Herne Hill Road SE24	<ul style="list-style-type: none"> • Indicative locations of National Grid assets included on context map. • Indicative light industrial area and the extent of 'sensitive residential neighbour' to be extended on the vision map.

		<ul style="list-style-type: none"> • Reduction in the number of residential units proposed (from 30-40 units to 25-30 units). • Factual updates to policy text. • No significant change to other development principles.
Site 24	King's College Hospital, Denmark Hill SE5	<ul style="list-style-type: none"> • Factual updates to policy text. • Clarification regarding the safeguarded waste site within the site added. • No significant change to other development principles.

APPENDIX B. REPRESENTATIONS MADE PURSUANT TO REGULATION 20

Introduction

- B.1.1. In line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council published the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) for a period of eight weeks between 8 March and 3 May 2024. The representations period was re-opened for another eight weeks between 18 June and 13 August 2024. Section 2 of this appendix (Regulation 19 stakeholder engagement) states who was invited to make representations and what engagement methods were used to publicise the representations procedure. This section meets the requirements set out in the first part of Regulation 22(1)(c)(v).
- B.1.2. A total of 322 representations by 292 respondents were made over the course of the two eight-week periods. A summary of the main issues raised by these representations is included in Section 3 of this appendix (Summary of representations made pursuant to Regulation 20). This section meets the requirements set out in the second part of Regulation 22(1)(c)(v).
- B.1.3. Section 4 outlines the Council's response to representations made pursuant to Regulation 20.

Regulation 19 stakeholder engagement

Stakeholder mapping

- B.2.1. Regulation 19(b) states that each of the general consultation bodies and each of the specific consultation bodies invited to make representations under Regulation 18(1) are to be invited to make representations as part of the Regulation 19 representations procedure.
- B.2.2. In line with this requirement, the Council engaged directly with those included on Lambeth's Planning Policy consultation database, which comprises contact details for the relevant general consultation bodies and specific consultation bodies as well as contact details for those who submitted representations as part of the Regulation 18 consultation.

- B.2.3. In line with the SCI, the Council sought to broaden the range of stakeholders to be invited to make representations on the SADPD PSV. Paragraphs B.2.40 to B.2.59 of this appendix detail the publicity and dissemination methods used to raise awareness of the representations procedure within the local community.

Stakeholder engagement methods

- B.2.4. In line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a copy of each of the proposed submission documents and a copy of the statement of representations procedure were made available on 8 March 2024 in accordance with Regulation 35. These documents remained available during a first representations period, which lasted eight weeks and ended on 3 May 2024. The representations period was re-opened for eight additional weeks between 18 June and 13 August 2024. The documents above were also made available for this second period of representation.
- B.2.5. Regulation 35(1) states that a document is to be taken to be made available by a local planning authority when it is:
- a) Made available for inspection at the principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and
 - b) Published on the local planning authority's website.

Hard copies made available for inspection

- B.2.6. Physical copies of all key proposed submission documents, including the Proposed Submission Version of the Site Allocations Development Plan Document, the Proposed Changes to the Policies Map, the Sustainability Appraisal (SustA) and SustA Non-technical Summary, and the Habitats Regulations Assessment (HRA) and HRA Non-technical Summary were made available for inspection by appointment at Lambeth Civic Centre.
- B.2.7. The same documents, along with a copy of the Statement of Representations Procedure and ten copies of the Regulation 19 Stage Representation Form and the Regulation 19 Stage Representation Form Guidance and Privacy Note, were displayed in all of Lambeth's ten public libraries for the duration of the period of representations under Regulation 19.

- B.2.8. The Regulation 19 Stage Representation Form followed the model representation form for Local Plans originally published by the Planning Inspectorate in July 2019, which had most recently been updated in November 2020. This is a suggested model form for local planning authorities to use when inviting representations on local plans at publication stage and was amended to adapt it to the content of the SADPD.
- B.2.9. Along the documents outlined in paragraphs B.2.6 and B.2.7, a cover letter was sent to librarians outlining the documents they were required to put on display available for public view during the period of representations, describing the purpose of the Regulation 19 representations period and explaining how to submit representations to the Council. The cover letter also asked librarians to assist customers that would like to view the documents online.

Publication on Lambeth's website

- B.2.10. A digital copy of the Statement of Representations Procedure as well as digital copies of all key documents described in paragraphs B.2.6 and B.2.7 were made available in a dedicated webpage hosted on Lambeth's website. In addition to the key documents, digital copies of all documents forming the SADPD PSV evidence base were also made available.
- B.2.11. Figures B.1, B.2 and B.3 of this appendix show screenshots of this webpage and how the material was presented.

Figure B.1. Screenshots 1 and 2 of the SADPD PSV dedicated webpage (8 March – 3 May 2024)

Home > Planning and Building Control > Planning policy and guidance > Site Allocations Development Plan Document

Site Allocations Development Plan Document

The Site Allocations Development Plan Document Proposed Submission Version is out for consultation

Once adopted, the Site Allocations Development Plan Document (SADPD) will form part of the statutory development plan for Lambeth. Alongside the [London Plan 2021](#), the [Lambeth Local Plan 2021 \(PDF 16.4MB\)](#) and the [Southbank and Waterloo Neighbourhood Plan \(PDF 5MB\)](#) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

We are now seeking your views on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV).

[Have your say on the SADPD PSV →](#)

The consultation runs for a period of 8 weeks from **9am on Friday 8 March to 5pm on Friday 3 May 2024**.

Background

A Draft Site Allocations Development Plan Document (Draft SADPD) was consulted on under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 10 January to 22 February 2022. The representations received during this consultation have been considered by officers and informed the SADPD PSV.

For details of the previous consultation, please visit the [Regulation 18 consultation webpage](#).

Regulation 19 consultation

We are now seeking your views on the SADPD PSV.

The SADPD PSV includes site-specific planning policies for 13 sites proposed for allocation in Lambeth, distributed across the borough.

Comments are invited on whether the SADPD PSV is legally compliant and meets the tests of 'soundness' as set out in the [National Planning Policy Framework \(NPPF\) \(paragraph 35\)](#). This consultation is in accordance with [Regulation 19 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

To find out more about the SADPD PSV consultation and how to respond, please visit our [have your say on the SADPD PSV webpage](#).

- B.2.12. The dedicated SADPD webpage invited comments on whether the SADPD PSV was legally compliant and met the tests of 'soundness' as set out in paragraph 35 of the NPPF.
- B.2.13. The webpage also provided background information on the purpose of the SADPD, how this document, if adopted, would relate to the rest of documents forming Lambeth's Development Plan, and a brief summary of the previous stages in the preparation of the document.
- B.2.14. Links to a dedicated webpage on the Regulation 18 consultation as well as links to Lambeth's Local Plan evidence base and examination library were also made available as background information.
- B.2.15. The dedicated SADPD webpage included a link to an online survey ('SADPD PSV Survey') hosted on the online platform Survey Monkey. The online survey replicated the questions and structure of the Regulation 19 Representation Form made available at Lambeth's Civic Centre and public libraries.

Figure B.2. Screenshots 3 and 4 of the SADPD PSV dedicated webpage (8 March – 3 May 2024)

The following documents have been published for your consideration as part of the Regulation 19 consultation:

- [Lambeth Site Allocations Development Plan Document – Proposed Submission Version \(PDF 7.66MB\)](#)
- [Proposed Changes to the Policies Map \(PDF 6.09MB\)](#)
- [Sustainability Appraisal \(for all sites\) \(PDF 3.3MB\)](#) and [Sustainability Appraisal Non-Technical Summary \(for all sites\) \(PDF 831.65KB\)](#)
- [Habitat Regulations Assessment \(for all sites\) \(PDF 538.2KB\)](#) and [Habitat Regulations Assessment Non-Technical Summary \(for all sites\) \(PDF 323.4KB\)](#)

You can view the formal [Regulation 19 Consultation Statement of Representations Procedure \(PDF 72.01KB\)](#) for further information.

Representations can be made using the online survey available on the consultation webpage or the [Regulation 19 Stage Representation Form \(PDF 445.43KB\)](#). For guidance on how to make representations please see our [Regulation 19 Stage Representation Form Guidance and Frequently Asked Questions \(PDF 148.5KB\)](#).

Hard copies of each of these documents, form and guidance notes, are also available to inspect at:

- Lambeth Civic Centre, 6 Brixton Hill, London SW2 1EG by appointment only. To arrange, please email sadpd@lambeth.gov.uk.
- any of the 10 libraries in Lambeth (Brixton, Carnegie, Clapham, Durning, Minet, Streatham, Tate South Lambeth, Upper Norwood, Waterloo, and West Norwood) during normal opening hours. For more details, visit our [libraries directory](#).

In addition to these key documents, you may also wish to review the SADPD PSV evidence base, which includes the following documents:

- [Site Selection Evidence Paper \(PDF 594.09KB\)](#)
- [Flood Risk Evidence Paper \(for all sites\) \(PDF 16.29MB\)](#)
- Design Evidence Papers:
 - [Site 1: Royal Street SE1 \(PDF 3.33MB\)](#)
 - [Site 2: St Thomas' Hospital SE1 \(PDF 2.34MB\)](#)
 - [Site 3: 35-37 and Car Park Leigham Court Road SW16 \(PDF 3.07MB\)](#)
 - [Site 7: 6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11 \(PDF 3.08MB\)](#)
 - [Site 8: 110 Stamford Street SE1 \(PDF 1.77MB\)](#)
 - [Site 9: Gabriel's Wharf and Princes Wharf, Upper Ground SE1 \(PDF 3.25MB\)](#)
 - [Site 17: 330-336 Brixton Road SW9 \(PDF 3.14MB\)](#)
 - [Site 18: 300-346 Norwood Road SE27 \(PDF 2.77MB\)](#) and [Site 18: 300-346 Norwood Road SE27 Appendix \(PDF 4.17MB\)](#)
 - [Site 20: Tesco, 13 Acre Lane SW2 \(7.19MB\)](#)
 - [Site 21: 51-57 Effra Road SW2 \(PDF 2.89MB\)](#)
 - [Site 22: 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24 \(PDF 6.96MB\)](#)
 - [Site 23: Land at corner of Coldharbour Lane and Herne Hill Road SE24 \(PDF 4.36MB\)](#)
 - [Site 24: King's College Hospital, Denmark Hill SE5 \(PDF 6.21MB\)](#)

- B.2.16. Those preferring not to use Survey Monkey to submit their representation were made aware representations could also be submitted by downloading and completing the digital copy of the Regulation 19 Stage Representation Form available on the same webpage and sending it via email to the indicated email address or by post to the indicated P.O. Box.

Figure B.3. Screenshot 5 of the SADPD PSV dedicated webpage (8 March – 3 May 2024)

- [Heritage Impact Assessment \(for sites 1 and 2\)](#) (PDF 2.63MB)
- [Daylight and Sunlight Assessment \(for all sites\)](#) (PDF 44.99KB)
- [Viability Assessment \(for all sites\)](#) (PDF 1.24MB)
- [Regulation 18 Consultation Report \(for all sites\)](#) (PDF 12.19MB)
- [Duty to Cooperate Statements of Common Ground](#) (PDF 10.35MB)

Other background information

The evidence base of the Lambeth Local Plan, which was adopted on 22 September 2021, can be found on the [Local Plan evidence base page](#). Details about the examination of the Local Plan are also available in the [Local Plan examination library](#).

- B.2.17. The web content of the SADPD dedicated webpage as well as all documents made available were written in plain English, avoiding technical jargon wherever possible. In some instances, in order to convey the correct meaning in a statutory planning context, the use of technical language was considered necessary.
- B.2.18. A separate webpage titled 'Have your say on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV)' and hosted under the Consultations section of Lambeth's website was launched on 8 March 2024. This webpage, prepared by the Council-wide consultation team, included some background information and outlined the next steps after the representations period ended. A link to the SADPD dedicated webpage was included to allow those interested to view the proposed submission documents, including the SADPD PSV, and associated evidence. This webpage also included a link to the online survey hosted on Survey Monkey. Screenshots of the 'Have your Say' webpage are shown in Figure B.4 below.

Figure B.4. Screenshots 1 and 2 of the 'Have your Say' webpage

Consultations

Help improve this site by giving your [feedback](#)

[Home](#) > [Consultations](#) >
 Have your say on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV)

Have your say on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV)

We want your views on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV). Please share your views with us by completing our online survey within the webpage or by sending in comments by post or using the email address provided.

Open date:
Friday, 8 March 2024 at 9:00am

Close date:
Friday, 3 May 2024 at 5:00pm

Type:
Consultation

Neighbourhood:
Lambeth wide

Category:
Planning and building control

Email
sadpd@lambeth.gov.uk

Please note this consultation is closed

Background / Proposal

Consultation on the Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) follows on from a previous consultation on the Draft Site Allocations Development Plan Document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which ran from 10 January to 22 February 2022. The representations received during this consultation have been considered by Officers and informed the SADPD PSV.

The SADPD PSV proposes site-specific planning policies for thirteen sites in Lambeth distributed across the borough.

Once adopted, the SADPD will form part of the statutory development plan for Lambeth, which comprises the [London Plan 2021](#), the [Lambeth Local Plan 2021 \(PDF 16.4MB\)](#) and the [Southbank and Waterloo Neighbourhood Plan \(PDF 5MB\)](#). The SADPD will help deliver homes and workspaces, secure benefits for communities and seek to improve the quality of places and the environment in Lambeth.

Comments are invited on whether the SADPD PSV is legally compliant and meets the tests of 'soundness' as set out in the [National Planning Policy Framework \(NPPF\)](#). This consultation is in accordance with [Regulation 19 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

To view the SADPD PSV and associated evidence, please visit the [Site Allocations Development Plan Document webpage](#).

Read the [formal consultation statement](#).

After the consultation ends

All representations received will be shared with the Government appointed Inspector who in due course will undertake the Examination of the Site Allocations Development Plan Document.

How to respond

You can have your say by completing the online survey. If you wish to make representations about more than one part of the SADPD or associated Proposed Changes to the Policies Map, please complete an additional survey.

[SADPD Survey](#) →

You can also submit comments to us by:

- email at sadpd@lambeth.gov.uk
- post at

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

B.2.19. In order to correct the error with the notification email sent on 8 March 2024 (please refer to paragraphs B.2.45 to B.2.49), the representations procedure was re-opened for a further eight-week period. The content of the dedicated SADPD website was updated again to reflect this and allow for further representations to be made online via the link to the Survey Monkey representations form. Figures B.5 and B.6 below show the content of the dedicated webpage between 18 June to 13 August 2024, the period the representations procedure was re-opened.

Figure B.5. Screenshots 1 and 2 of the SADPD PSV dedicated webpage (18 June – 13 August 2024)

Home > Planning and Building Control > Planning policy and guidance > Site Allocations Development Plan Document

Site Allocations Development Plan Document

The council previously published its Regulation 19 Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV) between 8 March and 3 May 2024.

Due to a technical matter linked to sending email notifications, not everyone on our Planning Policy consultee database received this notification. We are therefore re-publishing the documents pursuant to Regulation 19 to ensure all the consultees on the database are notified of the publication.

The Regulation 19 representation period has been re-opened for eight weeks running from 18 June to 5pm on 13 August 2024.

Please note if you previously submitted representations, you do not need to write again as part of this process. Your representations have been recorded and will be considered and submitted to the Planning Inspectorate (as previously advised) as part of the Examination process.

Regulation 19

Comments are invited on whether the SADPD PSV is legally compliant and meets the tests of 'soundness' as set out in the [National Planning Policy Framework \(NPPF\)](#) (paragraph 35). This consultation is in accordance with [Regulation 19 of the Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#).

You can have your say by completing the online survey below. If you wish to make representations about more than one part of the SADPD or associated Proposed Changes to the Policies Map, please complete an additional survey.

SADPD PSV Survey →

You can also submit representations by completing the [Regulation 19 Stage Representation Form](#) (PDF 444KB) and emailing it to sadpd@lambeth.gov.uk or posting it to:

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

You can view the formal Regulation 19 Consultation [Statement of Representations Procedure](#) (PDF 116KB) for further information. For guidance on representations please see our [Regulation 19 Stage Representation Form Guidance and Privacy Notice](#) (PDF 149KB)

Please submit your representations by **5pm on Tuesday 13 August 2024**.

The following documents are available for consideration as part of the Regulation 19 consultation:

- [Lambeth Site Allocations Development Plan Document – Proposed Submission Version](#) (PDF 7.66MB)
- [Proposed Changes to the Policies Map](#) (PDF 6.09MB)
- [Sustainability Appraisal \(for all sites\)](#) (PDF 3.3MB) and [Sustainability Appraisal Non-Technical Summary \(for all sites\)](#) (PDF 831.65KB)
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Hard copies of each of these documents, form and guidance notes, are also available to inspect at:

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Figure B.6. Screenshots 3 and 4 of the SADPD PSV dedicated webpage (18 June – 13 August 2024)

In addition to these key documents, you may also wish to review the SADPD PSV evidence base, which includes the following documents:

- [Site Selection Evidence Paper](#) (PDF 594.09KB)
- [Flood Risk Evidence Paper \(for all sites\)](#) (PDF 16.29MB)
- Design Evidence Papers:
 - [Site 1: Royal Street SE1](#) (PDF 3.33MB)
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 - [Site 22: 1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24](#) (PDF 6.96MB)
 - [Site 23: Land at corner of Coldharbour Lane and Herne Hill Road SE24](#) (PDF 4.36MB)
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Background

Once adopted, the Site Allocations Development Plan Document (SADPD) will form part of the statutory development plan for Lambeth. Alongside the [London Plan 2021](#), the [Lambeth Local Plan 2021](#) (PDF 16.4MB) and the [Southbank and Waterloo Neighbourhood Plan](#) (PDF 5MB) and associated planning guidance, the SADPD will help deliver new homes and workspaces, secure benefits for communities and improve the quality of places and the environment in Lambeth.

A Draft Site Allocations Development Plan Document (Draft SADPD) was consulted on under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 from 10 January to 22 February 2022. The representations received during this consultation were considered by officers and informed the SADPD PSV.

For details of the previous consultation, please visit the [Regulation 18 consultation webpage](#).

Other background information

The evidence base of the Lambeth Local Plan, which was adopted on 22 September 2021, can be found on the [Local Plan evidence base page](#). Details about the examination of the Local Plan are also available in the [Local Plan examination library](#).

B.2.20. The following supplementary engagement methods were used:

Engagement with ward Councillors

B.2.21. Ward Councillors were engaged in the context of an informal Cabinet Members meeting on 8 November 2022. During this meeting Councillors received an update on the progress made since the Regulation 18 consultation period ended and next steps

to be taken before submission to government for Examination. Each of the 14 sites originally included in the Draft SADPD were presented.

B.2.22. Early engagement with ward Councillors on the Regulation 19 process continued in the form of a Planning Policy Liaison Forum (PPLF) meeting held on 16 November 2023. The PPLF is a forum where planning policy matters are discussed with ward Councillors to ensure they have an opportunity to shape/influence emerging plans and guidance. The PPLF meeting was attended by:

- Cllr Danial Adilypour, ward Councillor for Streatham Common and Vale (Labour and Co-operative) and Deputy Leader for the Council (Housing, Investment and New Homes),
- Cllr Scott Ainslie, ward Councillor for Streatham St Leonard's (Green),
- Cllr David Bridson, ward Councillor for Brixton Acre Lane (Labour and Co-operative) and Deputy Cabinet Member for Housing, Investment and New Homes,
- Cllr Judith Cavanagh, ward Councillor for West Dulwich (Labour and Co-operative), and
- Cllr Joanne Simpson, ward Councillor for Stockwell West and Larkhall (Labour).

B.2.23. During the PPLF meeting ward Councillors were given an overview of the SADPD and its purpose. The preparation process was explained with a focus on Regulations 19 to 22. Officers presented each of the proposed 13 sites and answered questions raised about specific sites and the SADPD as a whole.

B.2.24. On 24 November 2023 a briefing with West Norwood ward Councillors was held. The invite to this meeting was extended to councillors within the wards of Knight's Hill, West Dulwich and St Martin's (the three wards converging in the proximity of Site 18).

B.2.25. During this briefing, officers explained the rationale for the preparation of the SADPD, gave an overview of progress to date and next steps, and summarised the changes to the Site 18 and 19 allocations as a result of the Regulation 18 consultation process. Officers explained in detail the purpose of the Regulation 19 representations procedure and how comments sought were on the legal compliance and soundness of the development plan document proposed for submission. This briefing gave ward Councillors an understanding of the SADPD PSV proposals for the sites located within their ward and the Regulation 19 representations procedure.

B.2.26. The following ward Councillors were invited to the meeting:

- Cllr Jackie Meldrum, Knight's Hill ward Councillor (Labour);

- Cllr Sonia Winifred, Knight's Hill ward Councillor (Labour);
- Cllr Ibtisam Adem, Knight's Hill ward Councillor (Labour);
- Cllr Rebecca Spencer, Knight's Hill ward Councillor (Labour); and
- Cllr Judith Cavanagh, West Dulwich ward Councillor (Labour and Co-operative);
- Cllr Fred Cowell, West Dulwich ward Councillor (Labour);
- Cllr Christine Banton, Gipsy Hill ward Councillor (Labour);
- Cllr Olga FitzRoy, St Martin's ward Councillor (Labour and Co-operative);
- Cllr Saleha Jaffer, St Martin's ward Councillor (Labour); and
- Cllr Danial Adilypour, ward Councillor for Streatham Common and Vale (Labour and Co-operative) and Deputy Leader for the Council (Housing, Investment and New Homes)

B.2.27. The SADPD was subsequently discussed at Cabinet held on 15 January 2024, where the Proposed Submission Version of the SADPD (SADPD PSV) and the Proposed Changes to the Policies Map were agreed for publication and submission to government for independent examination.

B.2.28. At this meeting, the preparation process for the SADPD PSV with a focus on next steps was presented. This included a summary of the consultation process carried out under Regulation 18, the ways in which the consultation was publicised, the different media made available for stakeholders to make representations, a summary of the responses received and any changes arising from the Regulation 18 consultation.

B.2.29. Full Council at its meeting on 24 January 2024 approved publication of the SADPD PSV for Regulation 19 consultation and subsequent submission to government for independent examination.

B.2.30. Ward Councillors were also invited to the online briefing sessions discussed in paragraphs B.2.36 to B.39 of this appendix.

B.2.31. A further briefing was requested by Cllr Jackie Meldrum, ward Councillor for Knight's Hill (Labour), to discuss proposals for Site 18 in West Norwood. Cllr Meldrum and other ward Councillors from the three wards converging in the proximity of Site 18 (Knight's Hill, West Dulwich and St Martin's wards) were offered an online meeting on 18 April 2024. This meeting was attended by the following ward Councillors:

- Cllr Judith Cavanagh, West Dulwich ward Councillor (Labour and Co-operative);

- Cllr Fred Cowell, West Dulwich ward Councillor (Labour);
- Cllr Saleha Jaffer, St Martin's ward Councillor (Labour); and
- Cllr Christine Banton, Gipsy Hill ward Councillor (Labour).

B.2.32. Cllr Jackie Meldrum, who was unable to attend the online meeting, was briefed separately on another date.

Engagement with local MPs

B.2.33. Three parliamentary constituencies fell within Lambeth's boundary before the 2024 general election. On 13 December 2023, the three MPs of these constituencies (Florence Eshalomi, MP for Vauxhall; Helen Hayes, MP for Dulwich and West Norwood; and Bell Ribeiro-Addy, MP for Streatham) were offered a briefing session with Council officers regarding the SADPD publication and submission.

B.2.34. The following MP briefings took place:

- Helen Hayes, MP for Dulwich and West Norwood (9 January 2024)
- Helen Hayes, MP for Dulwich and West Norwood (22 April 2024)

B.2.35. The three MPs were also invited to the area online briefings, discussed in paragraphs B.2.36 to B.2.39 of this appendix. The MPs who attended a briefing were asked to disseminate information about the consultation to their constituents.

Online Area Briefings

B.2.36. Online area briefings were held with representatives from community groups and organisations based in five of the six neighbourhoods in Lambeth (Waterloo, Kennington, Brixton, Loughborough Junction, and West Norwood) in which the SADPD PSV proposes a site allocation. A briefing session to cover the only site allocation in Streatham (Site 3) was not considered necessary since this site had proved to be relatively non-contentious during the Regulation 18 consultation. Site allocations located within the Brixton and Loughborough Junction neighbourhoods were grouped together and discussed in one single online area briefing. Ward Councillors and MPs were also invited. A full list of the invitees and attendees is set out in Table B.1.

Table B.1. 2024 Online Area Briefings Invitees and Attendees

Area (date)	Invitees	Attendees
West Norwood (9 April 2024)	<ul style="list-style-type: none"> • Cllr Jackie Meldrum, Knight's Hill ward Councillor (Labour); • Cllr Sonia Winifred, Knight's Hill ward Councillor (Labour); • Cllr Judith Cavanagh, West Dulwich ward Councillor (Labour and Co-operative); • Cllr Fred Cowell, West Dulwich ward Councillor (Labour); • Cllr Olga FitzRoy, St Martin's ward Councillor (Labour and Co-operative); • Cllr Saleha Jaffer, St Martin's ward Councillor (Labour) • Cllr Ibtisam Adem, Knight's Hill ward Councillor (Labour) <p>• Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative)</p> <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Norwood Planning Assembly • Norwood Forum • Station to Station BID • Norwood Action Group 	<ul style="list-style-type: none"> • Cllr Saleha Jaffer, St Martin's ward Councillor (Labour) • Former Co-Convener Norwood Planning Assembly • Chair of Norwood Forum; • BID Manager for Station to Station; • Chair of the Norwood Society Planning Sub Committee • Resident – Casewick Road
Brixton and Loughborough Junction (10 April 2024)	<ul style="list-style-type: none"> • Cllr Jim Dickson, Herne Hill and Loughborough Junction ward Councillor (Labour) • Cllr Pauline George, Herne Hill and Loughborough Junction ward Councillor (Labour) • Cllr Deepak Sardiwal, Herne Hill and Loughborough Junction ward Councillor (Labour) • Cllr James Bryan, Brixton North ward Councillor (Labour and Co-operative) • Cllr John-Paul Ennis, Brixton North ward Councillor (Labour and Co-operative) • Cllr Nanda Manley-Browne, Brixton North ward Councillor (Labour and Co-operative) 	<ul style="list-style-type: none"> • Cllr Jim Dickson, Herne Hill and Loughborough Junction ward Councillor (Labour) • Cllr Deepak Sardiwal, Herne Hill and Loughborough Junction ward Councillor (Labour) • Cllr John-Paul Ennis, Brixton North ward Councillor (Labour and Co-operative) • Cllr Scarlett O'Hara, Brixton Windrush ward Councillor (Labour and Co-operative) • Cllr Adrian Garden, Brixton Rush Common ward Councillor (Labour) • Two representatives from Brixton Society

Area (date)	Invitees	Attendees
	<ul style="list-style-type: none"> • Cllr Donatus Anyanwu, Brixton Windrush ward Councillor (Labour and Co-operative) • Cllr Scarlett O'Hara, Brixton Windrush ward Councillor (Labour and Co-operative) • Cllr Sarbaz Barznji, Brixton Acre Lane ward Councillor (Labour and Co-operative) • Cllr David Bridson, Brixton Acre Lane ward Councillor (Labour and Co-operative) • Cllr Maria Kay, Brixton Acre Lane ward Councillor (Labour and Co-operative) • Cllr Marcia Cameron, Brixton Rush Common ward Councillor (Labour) • Cllr Adrian Garden, Brixton Rush Common ward Councillor (Labour) • Cllr Ben Kind, Brixton Rush Common ward Councillor (Labour) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) • Helen Hayes MP, MP for Dulwich and West Norwood (Labour and Co-operative) • Bell Ribeiro-Addy MP, MP for Streatham (Labour) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Brixton Society • Brixton BID • Brixton Neighbourhood Forum • Loughborough Junction Action Group • Herne Hill Society • Herne Hill Forum <p>Residents from:</p> <ul style="list-style-type: none"> • Baytree Road • Porden Road 	<ul style="list-style-type: none"> • Two representatives from Loughborough Junction Action Group • Resident – Baytree Road • Resident – Porden Road
Kennington (11 April 2024)	<ul style="list-style-type: none"> • Cllr David Amos, Kennington ward Councillor (Labour) 	<ul style="list-style-type: none"> • Cllr David Amos, Kennington ward Councillor (Labour)

Area (date)	Invitees	Attendees
	<ul style="list-style-type: none"> • Cllr Liam Daley, Kennington ward Councillor (Labour) • Cllr Jacqui Dyer, Kennington ward Councillor (Labour) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • Kennington, Oval and Vauxhall Neighbourhood Forum • Stop the Blocks Community Action Group Herne Hill Forum 	<ul style="list-style-type: none"> • Harry Gable on behalf of Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) • Representative from Kennington, Oval and Vauxhall Neighbourhood Forum • Two representatives from Stop the Blocks
Waterloo and South Bank (15 April 2024)	<ul style="list-style-type: none"> • Cllr Sarina Da Silva, Waterloo and South Bank ward Councillor (Labour) • Cllr Ibrahim Dogus, Waterloo and South Bank ward Councillor (Labour) • Florence Eshalomi MP, MP for Vauxhall (Labour and Co-operative) <p>Nominated representatives from:</p> <ul style="list-style-type: none"> • WeAreWaterloo BID • South Bank BID / South Bank Employers' Group • South Bank and Waterloo Neighbours (SoWN) neighbourhood forum • Waterloo Community Development Group • Coin Street Community Builders • Jubilee Gardens Trust • Elders Group • St John's the Evangelist Church 	<ul style="list-style-type: none"> • Cllr Sarina Da Silva, Waterloo and South Bank ward Councillor (Labour) • A representative from WeAreWaterloo BID • A representative from South Bank BID / South Bank Employers' Group • Two representatives from South Bank and Waterloo Neighbours (SoWN) neighbourhood forum • A representative from Waterloo Community Development Group • A representative from Coin Street Community Builders • A representative from Jubilee Gardens Trust • A representative from Elders Group

B.2.37. During these online area briefings officers explained the rationale for the preparation of the SADPD, gave an overview of progress to date and next steps, and summarised the changes to the relevant site allocations as a result of the Regulation 18 consultation process. Site 18 was presented to West Norwood representatives, sites 17, 20, 21, 22, 23 and 24 were presented to Brixton and Loughborough Junction representatives, site 7 was presented to Kennington representatives, and sites 1, 2, 8 and 9 were presented to South Bank and Waterloo representatives.

- B.2.38. Officers also explained how the purpose of the Regulation 19 consultation was related to legal compliance and soundness. The subsequent Examination process was also described during these online area briefings.
- B.2.39. MPs, ward Councillors and community representatives were given the opportunity to ask questions and express their views. They were also encouraged to disseminate information about the Regulation 19 representations procedure to the wider community.

Publicity and dissemination

- B.2.40. A wide range of methods were used to raise awareness about the Regulation 19 consultation to encourage stakeholders to respond. The publicity methods aimed to target the full range of stakeholders, not only those invited to make representations under Regulation 18.
- B.2.41. Ward Councillors and community groups were encouraged to raise awareness amongst their constituents and members through word of mouth and 'cascading'.

Notification email

- B.2.42. In line with Regulation 19(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, a notification email was sent out through the Gov Delivery platform on Friday 8 March 2024 to inform relevant stakeholders that the SADPD PSV was available for inspection and inviting them to make representations.
- B.2.43. This notification email was sent to contacts on Lambeth's Planning Policy consultation database, which includes general consultation bodies and specific consultation bodies that were invited to make representations under Regulation 18(1). The up-to-date database also includes contact details for those who submitted representations as part of the Regulation 18 consultation. Figure B.7 of this appendix shows screenshots of this notification email.

Figure B.7. Screenshot of notification email as sent on 8 March 2024

Share your views on Lambeth's Site Allocations Development Plan Document Proposed Submission

[Click to view in your browser](#)



Have your say on planning policies for sites proposed in Lambeth

Hello,

Today, we have launched our consultation for Lambeth's Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV). We want your views on the document, which sets out site-specific planning policies for thirteen sites proposed for allocation in Lambeth, distributed across the borough.

This consultation follows on from consultation on the Draft Site Allocations Development Plan Document which ran from 10 January to 22 February 2022. The representations received during this consultation have been considered by Officers and have informed the SADPD PSV.

Have your say

We are inviting you to have your say by either, taking our online survey, and/or by submitting your views by email or post. To have your say, please visit the [Lambeth website](#).

The consultation runs from 9am Friday, 8 March 2024 to 5pm Friday, 3 May 2024.

Get in contact

For further information please contact sadpd@lambeth.gov.uk.

Thank you,

The Lambeth Council Planning Policy Team

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B.2.44. Before the consultation period closed a reminder email was sent on 30 April encouraging stakeholders to submit their representations. Figure B.8 below shows a screenshot of the email sent.

Figure B.8. Screenshot of email on end of the representations period as sent on 30 April 2024

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

[Click to view in your browser](#)



Closing soon: Have your say on planning policies for sites proposed in Lambeth

Hello,

This is a friendly reminder to have your say on our consultation for Lambeth's Site Allocations Development Plan Document Proposed Submission Version (SADPD PSV), if you haven't already. The consultation closes this Friday, 3 May at 5pm.

We want your views on the document, which sets out site-specific planning policies for thirteen sites proposed for allocation in Lambeth, distributed across the borough.

Have your say

You can share your views by, taking our online survey, and/or by submitting your views by email or post. To have your say, please visit the [Lambeth website](#).

Get in contact

For further information please contact sadpd@lambeth.gov.uk.

Thank you,

The Lambeth Council Planning Policy Team

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- B.2.45. While reviewing the representations received it became apparent that not all contacts within the up-to-date Lambeth's Planning Policy consultation database had received the email notification. A technical issue when uploading the list of email addresses to the GOV Delivery platform was identified as the cause for the email notification not being sent to some of those individuals and organisations that submitted representations during the Regulation 18 consultation period.
- B.2.46. In order to correct this error, the documents were re-published pursuant to Regulation 19 on Tuesday 18 June 2024 for a further eight-week period to ensure all consultees on the database were notified of the publication.
- B.2.47. For this second period of representations, publicity and dissemination was limited to an email notification to contacts in the up-to-date Lambeth's Planning Policy consultation database. This also included everyone who responded to the previous

Regulation 19 representations procedure. However, the email notification made clear that those who had previously submitted representations did not need to write again as part of this process and their representations had been recorded and would be considered and submitted to the Planning Inspectorate (as previously advised) as part of the Examination process.

B.2.48. A screenshot of this second notification email is shown in Figure B.9.

B.2.49. The consultation database included 3,884 unique email addresses, including email addresses for those who submitted representations as part of the Regulation 18 consultation. 3,704 of these 3,884 unique email addresses were successfully contacted via the GOV Delivery platform on 18 June 2024. 171 of those email addresses were identified as 'Destination Suppressed' by the platform (no longer existing email addresses or addresses with a spam filter preventing delivery). Formatting and/or spelling issues were identified for the remaining nine email addresses. Once these issues were solved, the same notification email was sent to the nine email addresses via the local planning authority's corporate email address sadpd@lambeth.gov.uk.

Figure B.9. Screenshot of notification email as sent on 18 June 2024

Reconsulting on Lambeth's Site Allocations DPD Proposed Submission Version

[View this email in your browser](#)



Reconsulting on Lambeth's Site Allocations DPD Proposed Submission Version

Dear Consultee,

Lambeth Council previously published its Site Allocations DPD Proposed Submission Version between 8 March and 3 May 2024 and representations procedure pursuant to Regulation 19.

It has since come to light that due to a technical matter linked to sending email notifications, not everyone on our Planning Policy consultee database received this notification. We are therefore re-publishing the documents pursuant to Regulation 19 to ensure all the consultees on the database are notified of the publication. This also includes everyone who took the time to respond to the previous Regulation 19 consultation.

The Regulation 19 representation period is open for eight weeks and runs from **18 June to 5pm on 13 August 2024**.

Please note if you previously submitted representations, you do not need to write again as part of this process. Your representations have been recorded and will be considered and submitted to the Planning Inspectorate (as previously advised) as part of the Examination process.

The Site Allocations document sets out site-specific planning policies for thirteen sites proposed for allocation in Lambeth. The document is available to view on the [Lambeth website](#) and hard copies are available at [Lambeth Libraries](#) and Lambeth Civic Centre.

Other documents such as the Sustainability Appraisal are also available to view and comment upon.

Please see the [Statement of Representations Procedure](#).

How to comment

If you wish to make representations, you can do so:

- By completing our [online survey](#)
- By email at sadpd@lambeth.gov.uk
- By post to: **London Borough of Lambeth, Planning Policy and Place Shaping, P.O. Box 80771, London, SW2 9QQ**

All representations must be received by **5pm on 13 August 2024**.

If you have any other queries related to this consultation, please feel free to contact us on sadpd@lambeth.gov.uk.

Kind regards,

The Lambeth Planning Policy Team

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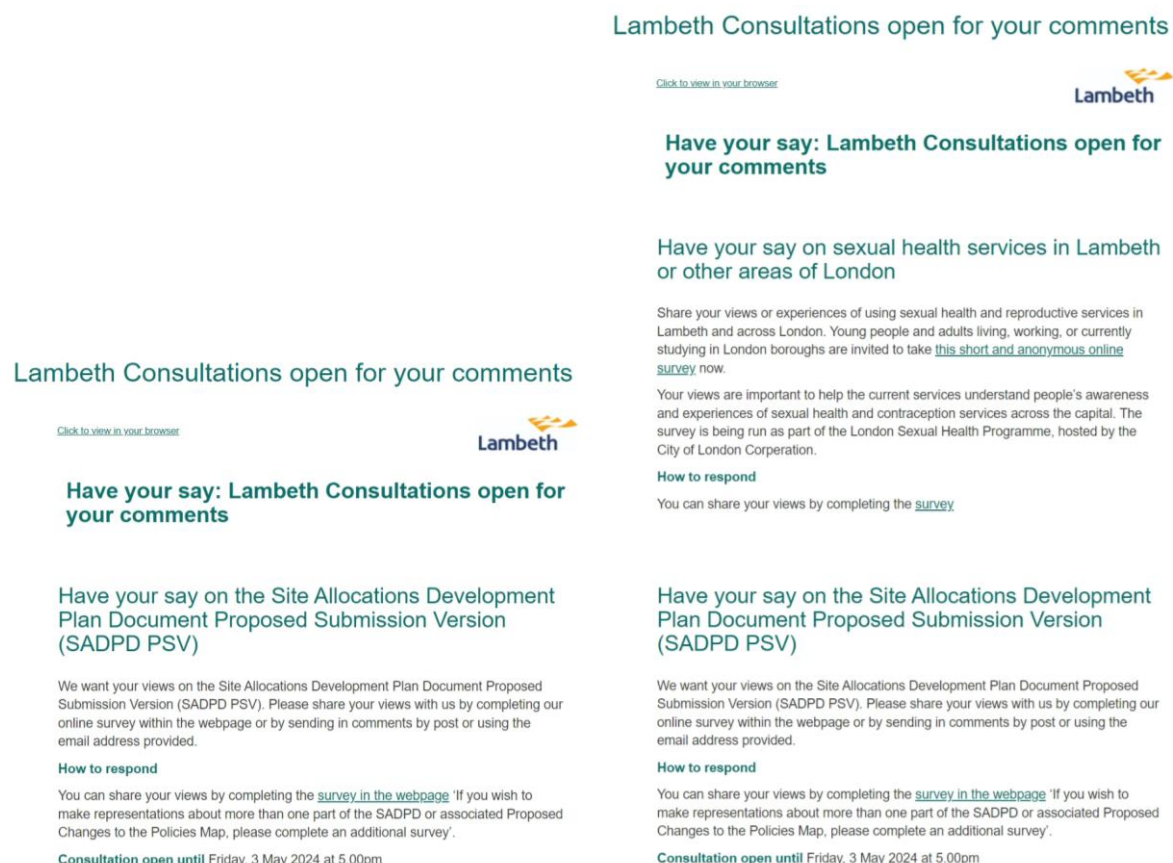
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Other email notifications

B.2.50. The Council's Consultations team sent out two emails during the Regulation 19 representations period, on 12 March 2024 and on 26 April 2024 to a range of community and voluntary organisations informing them of the consultation, how to

access information and how to respond. As shown in the screenshots below (Figure B.10), these emails included an entry on the SADPD PSV representations procedure.

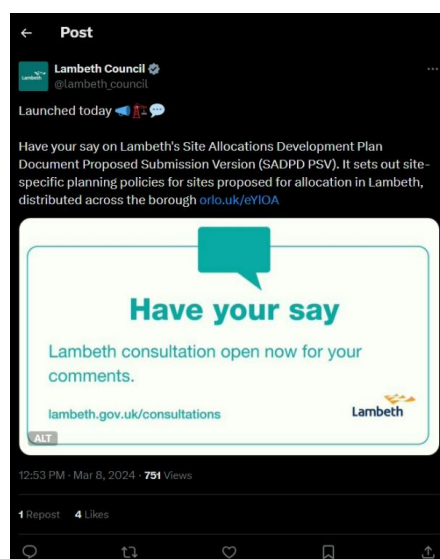
Figure B.10. Screenshots of entries relative to the SADPD PSV included in 'Have your Say' emails



Social media

- B.2.51. Details of Regulation 19 were also publicised on the Council's social media accounts, which include X (formerly known as Twitter), Facebook, LinkedIn and Nextdoor.
- B.2.52. On Friday 8 March 2024 a first social media post was published on X to inform stakeholders of the start of the representations procedure. A screenshot of this post is shown in Figure B.11 below.

Figure B.11. Screenshot of social media post on X as published on 8 March 2024



B.2.53. On Friday 15 March 2024 social media posts were published on X, Facebook and Nextdoor reminding stakeholders of the opportunity to take part in the consultation. Screenshots of these social media posts are shown in Figures B.12, B.13, and B.14 of this appendix.

Figure B.12. Screenshot of social media post on X as published on 15 March 2024

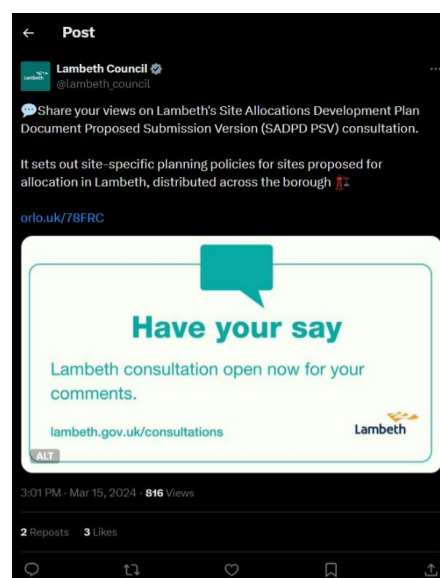


Figure B.13. Screenshot of social media post on Facebook as published on 15 March 2024

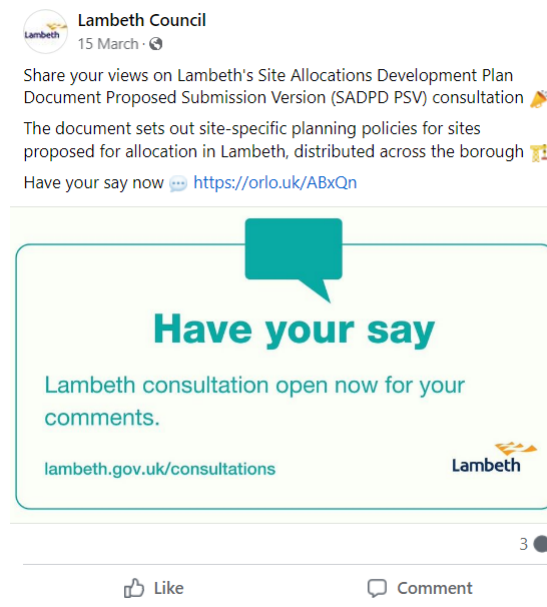
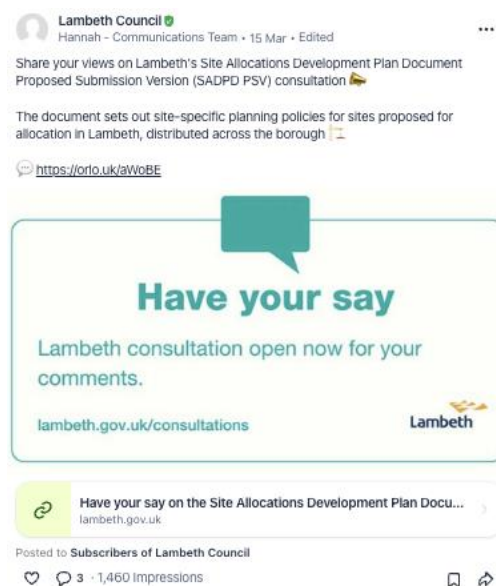
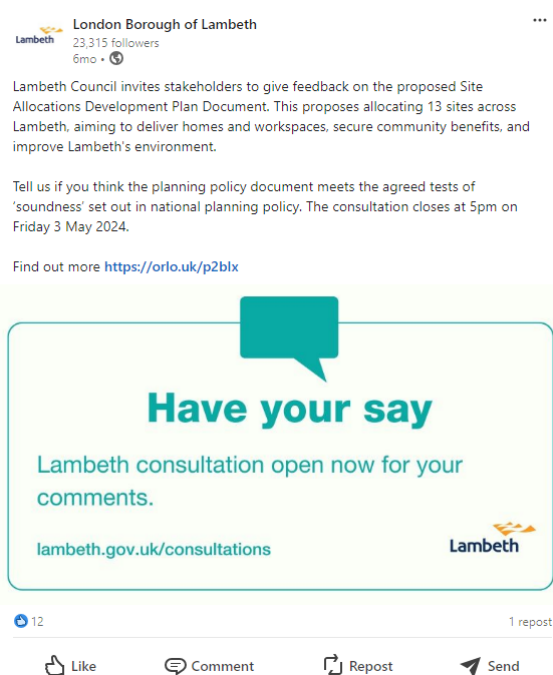


Figure B.14. Screenshot of social media post on Nextdoor as published on 15 March 2024



B.2.54. A reminder was also posted on LinkedIn on 22 March 2024. A screenshot of this social media post is shown in Figure B.15 below.

Figure B.15. Screenshot of social media post published on LinkedIn on 22 March 2024



B.2.55. Further reminders were posted on X on 24 March, 2 April and 22 April 2024, and Facebook on 11 April 2024. Figures B.16 and B.17 below show screenshots of these.

Figure B.16. Screenshots of social media posts on X as published on 24 March, 2 April and 22 April 2024

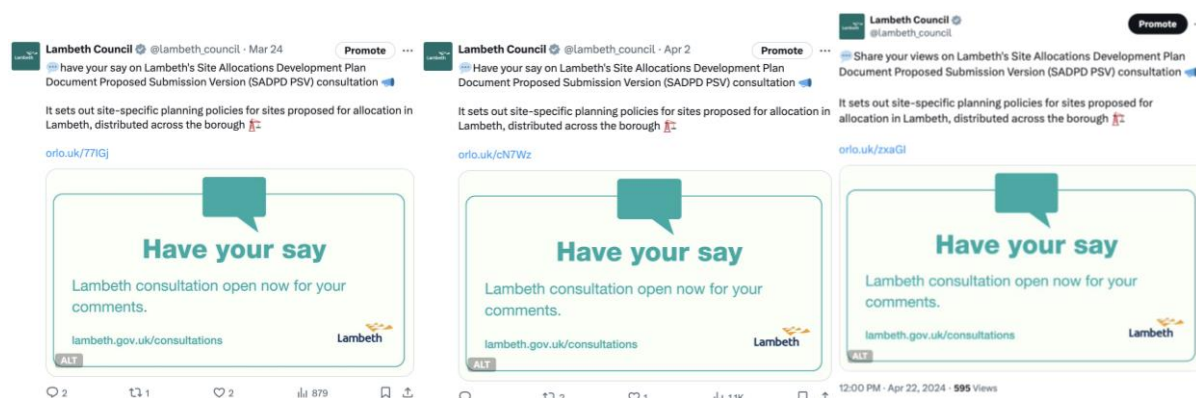


Figure B.17. Screenshot of social media post on Facebook as published on 11 April 2024



B.2.56. A social media post was published on LinkedIn on 30 April 2024 informing stakeholders of the period of representations closing soon. A screenshot of this post can be found in Figure B.18.

Figure B.18. Screenshot of social media post published on LinkedIn on 30 May 2024



B.2.57. On 1 May 2024 similar social media posts were published on X, Facebook and Nextdoor. Figures B.19, B.20 and B.21 show screenshots of these posts.

Figure B.19. Screenshot of social media post published on X on 1 May 2024



Figure B.20. Screenshot of social media post published on Facebook on 1 May 2024

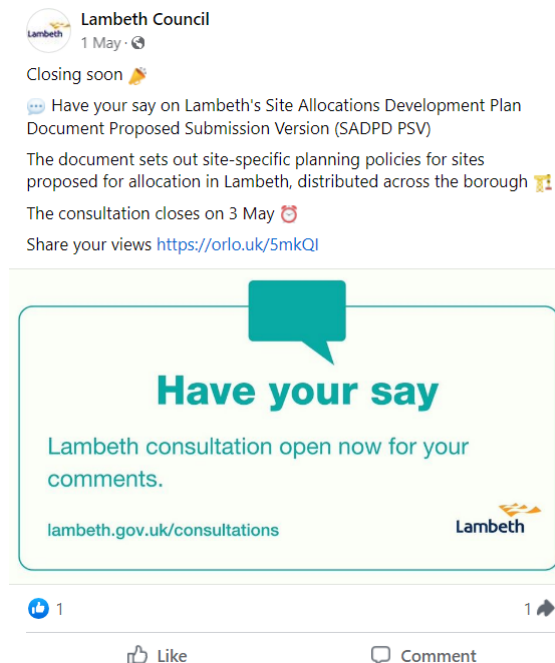
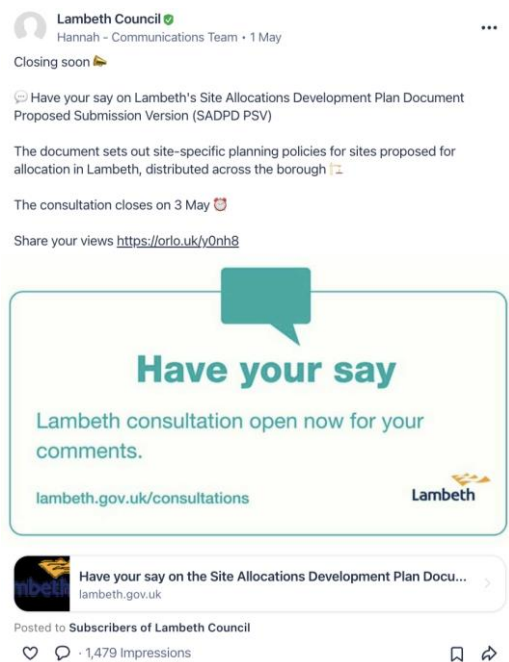


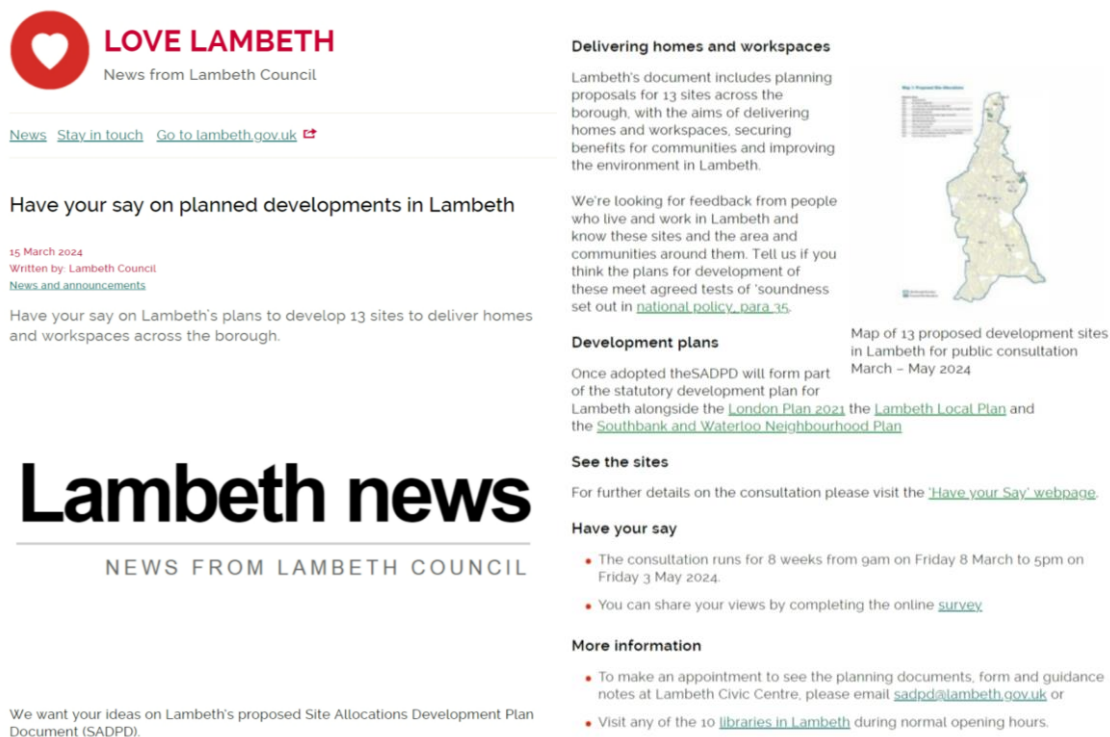
Figure B.21. Screenshot of social media post published on Nextdoor on 1 May 2024



Press release

B.2.58. An online article was published as a press release on Love Lambeth on 15 March 2024. The article outlined the proposals and explained the purpose of the representations procedure. It included links to the ‘Have your Say’ webpage and the online survey. A screenshot of this online article is shown in Figure B.22 below.

Figure B.22. Screenshots of online article on Love Lambeth as published on 15 March 2024



B.2.59. An entry on the Love Lambeth e-bulletin was added on 22 March to remind stakeholders they could make representations under the Regulation 19 representations procedure. A screenshot of this entry, which included a link to the Love Lambeth article, can be found below (Figure B.23).

Figure B.23. Screenshot of the entry in the Love Lambeth e-bulletin published on 22 March 2024

Have your say on planned developments in Lambeth

Lambeth Council is inviting stakeholders to give feedback on the proposed Site Allocations Development Plan Document. This proposes to allocate 13 sites across Lambeth, with the aims of delivering homes and workspaces, securing benefits for communities, and improving the environment in Lambeth.

Tell us if you think the planning policy document meet agreed tests of 'soundness' set out in national planning policy. The consultation closes at 5pm on Friday 3 May 2024.

[Find out more](#)

Summary of representations made pursuant to Regulation 20

Response to the Regulation 19 representations procedure

B.3.1. Over the course of the Regulation 19 representation procedure, 322 representations were made by 292 respondents.

B.3.2. The majority of representations (174) were submitted by email, while the rest (148) were submitted using the online survey available on the SADPD dedicated webpage. Some of the respondents preferred to use both media to submit their representations. Table B.2 below shows the number of representations making reference to each of the sites proposed in the SADPD PSV. Site 18 and Site 20 received the most representations, with 68 and 113 representations specifically referring to these sites respectively.

Table B.2. Number of representations made pursuant to Regulation 19 referring to each site

Site allocation	Site name	Total number of representations	Percentage (relative to total no. of representations)
Site 1	Royal Street SE1	11	3.4%
Site 2	St Thomas' Hospital SE1	10	3.1%

Site allocation	Site name	Total number of representations	Percentage (relative to total no. of representations)
Site 3	35-37 and Car Park Leigham Court Road SW16	13	4.0%
Site 7	6-12 Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11	21	6.5%
Site 8	110 Stamford Street SE1	8	2.5%
Site 9	Gabriel's Wharf and Princes Wharf, Upper Ground SE1	17	5.3%
Site 17	330-336 Brixton Road SW9	8	2.5%
Site 18	300-346 Norwood Road SE27	68	21.1%
Site 19	Knolly's Yard SW16 (now removed from SADPD)	9	2.8%
Site 20	Tesco, 13 Acre Lane SW2	113	35.1%
Site 21	51-65 Effra Road SW2	13	4.0%
Site 22	1 & 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street SE24	12	3.7%
Site 23	Land at corner of Coldharbour Lane and Herne Hill Road SE24	10	3.1%
Site 24	King's College Hospital, Denmark Hill SE5	8	2.5%

B.3.3. Most of the representations received referred either to one or several sites proposed for allocation in the SADPD PSV (except for Site 19 which was no longer proposed for allocation) or the SADPD PSV generally. However, two of those representations proposed new sites for inclusion on the SADPD. Responses to those two representations are included in table 'Site Allocation Development Plan Document – General Comments' included in Section 4 of this appendix (Council's response to representations made pursuant to Regulation 20).

B.3.4. The majority of the consultation respondents were individuals (245, which accounts for 83.9% of all respondents). This figure excludes elected politicians. Table B.3 below provides a breakdown of the organisations that responded to the Regulation 19 representations procedure by type.

Table B.3. Organisations responding to Regulation 19 consultation by type

Type (number of responses received)	Respondent
Housing co-operative (1)	<ul style="list-style-type: none"> • Pearman Street Co-operative Ltd
Business improvement district (2)	<ul style="list-style-type: none"> • Station to Station BID • inStreatham BID
Community group (12)	<ul style="list-style-type: none"> • Black Thrive • Elders Group Waterloo and Southbank • Loughborough Junction Action Group (LJAG) • Norwood Action Group (NAG) • Norwood Forum • Norwood Society • Stop the Blocks Community Action Group • Streatham Alliance • Streatham Society • The Brixton Society • Waterloo Community Development Group • West Norwood and Tulse Hill Community Stakeholder Group
Developer / landowner (11)	<ul style="list-style-type: none"> • AA Homes and Housing • Aquila Properties Limited • Coin Street Community Builders (CSCB) • Earlswood Homes • Guy's and St Thomas' NHS Trust • Hardess Yard Ltd • HSBC Bank Pension Trust UK Ltd • LPPI Real Estate Fund • MEC London Property 3 (General Partner) Ltd • Network Rail Property • Places for London (the TfL Property Company)
Elected politician (3)	<ul style="list-style-type: none"> • Ward Councillor for Brixton Acre Lane (Labour and Co-operative) • Ward Councillor for Knight's Hill (Labour) • MP for Dulwich and West Norwood (Labour and Co-operative)
Infrastructure provider (2)	<ul style="list-style-type: none"> • National Grid Electricity Transmission • Thames Water
Student accommodation provider (1)	<ul style="list-style-type: none"> • Unite Group PLC
Neighbourhood Planning Forum (3)	<ul style="list-style-type: none"> • South Bank & Waterloo Neighbours
Other local authorities (3)	<ul style="list-style-type: none"> • Gloucester County Council, Minerals and Waste Planning Authority • London Borough of Croydon • London Borough of Southwark
Statutory consultees (7)	<ul style="list-style-type: none"> • Environment Agency • Greater London Authority (GLA) • Historic England • National Highways • Natural England • Port of London Authority • Transport for London

Type (number of responses received)	Respondent
Not-for-profit organisations (2)	<ul style="list-style-type: none"> • Incredible Edible • We Are 336
Total (47)	

B.3.5. Those who responded via the Survey Monkey online survey were asked optional questions about their demographic characteristics. However, for those respondents submitting their representations by email (174 of 322 representations), demographic information was not collected.

B.3.6. The data collected refers therefore to a minority of respondents, those that when submitting representations via the Survey Monkey online survey opted to provide demographic information as part of their response. Most of those respondents (21) were aged between 35 and 44 years old, followed by those aged between 45 and 54 (12) and between 55 and 64 (11). Only eight respondents were aged between 65 and 74, same number of respondents aged between 25 and 34. The least represented age group was that of those aged between 75 and 84 years old, with only three respondents.

Main issues raised in representations

B.3.7. Officers analysed the content of all representations made as part of the Regulation 19 representations procedure. A summary of the main points raised for each of the 13 sites included in the SADPD PSV is available below.

Site 1: Royal Street SE1

B.3.8. The main points raised to the proposed approach for Site 1 were:

- Support site allocation
- Site should accommodate more residential units
- Higher affordable housing figure should be sought
- Retention, retrofit or extension of existing buildings should be the starting point
- Technical wording change requested re. flooding
- Concern about impact on trees
- Concern about open space retention
- References should be added to historic planning permission on site
- Extra references to transport requested

- References should be added to river policies
- Water supply infrastructure upgrade required; no concerns about wastewater infrastructure
- Heritage Impact Assessment will be required for applications
- Should protect city farm

Site 2: St Thomas' Hospital SE1

B.3.9. The main points raised to the proposed approach for Site 2 were:

- Support site allocation and hospital development
- Site is suitable for key worker housing
- Site allocation should be wider
- Restrictions on height and extent of development may limit future development opportunities; masterplan required
- Green space on the site should be retained
- Technical wording change requested re. flooding
- Should specify a substantial reduction in car parking
- Extra references to transport requested
- References should be added to river policies
- Can't assess impact on water supply or wastewater and sewage infrastructure
- Heritage Impact Assessment will be required for applications
- Concern about cumulative impacts of sites 1 and 2 on Lambeth Palace Road
- Concern about impact on Westminster World Heritage Site

Site 3: 35-37 and Car Park Leigham Court Road SW16

B.3.10. The main points raised to the proposed approach for Site 3 were:

- Support the redevelopment of the site for alternative uses.
- Extension of the existing town centre to include the site allocation should be removed.
- Allocation states development would 'attractive gateway to town centre from the south', however, Streatham town centre is actually south of Leigham Court Road.
- Site allocation fails to consider alternative uses for the site that would better serve the existing community's needs.
- Scale and massing of proposals not in keeping with the surrounding context.
- Proposals should be scaled back.

- Scale and massing to impact on views of the Leigham Court Estate and Leigham Court Road Conservation Areas. Impact not given sufficient consideration.
- 25-30 units for this 0.22ha site in highly connected area (PTAL 6a) could be seen as unambitious. Sites such as this should be maximised.
- Site allocation does not identify residential neighbour at 33A Leigham Court Road, this incorrectly labelled as a "retail" unit, therefore fails to consider impacts such a loss of privacy, overshadowing, and noise pollution.
- Sustainability Appraisal and related evidence based flawed due to failure to identify residential property at 33A Leigham Court Road.
- No confidence that design will be scrutinised.
- Supportive of additional text on planning obligations to fund public realm improvements.
- Policy text should clarify existing car parking to be removed and development car free, except for disabled persons' parking and servicing.
- Car park should be retained to ensure vitality of town centre, this will impact local businesses, residents, and people with mobility issues.
- Supportive of the recommendation to consider risks to groundwater sources associated with deep construction works.
- Supportive of the identification of the car park as a potential previous contaminative use of the site.
- Redevelopment threatens existing habitats on site, breaching environmental regulations and contradicting policies aimed at sustainable design, conserving biodiversity, and urban greening.
- The consultation process was flawed due to technical issues; therefore this did not comply with statutory requirements. Local residents and businesses were not accurately informed, and therefore were prejudiced.

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

B.3.11. The main points raised to the proposed approach for Site 7 were:

- Support allocation of site / principle of redevelopment, allocation would make a more efficient use of existing land.
- Purpose Built Student Accommodation-led mixed-use scheme comprising replacement industrial and community space presents the optimal solution.
- Light industrial capacity should be significantly increased.
- Reduction in residential units from the draft SADPD to the SADPD PSV shows a lack of ambition, this should revert back to previous position.

- Scale of development out of character with surrounding context.
- Site allocation does not properly consider the requirements of the ECOA Framework and Pullens Estate Conservation Area, as applied by the Woodland's Nursing Home scheme.
- Does not properly consider potential harm to nearby heritage assets.
- Scale of proposals will result in unacceptable impact on amenity (daylight/sunlight, outlook, privacy, noise).
- Access issues on Kennington Lane.
- Tall buildings site would have a higher embodied carbon than lower rise buildings.
- Inclusion of basement significantly raises embodied carbon.
- Viability report does not take into account costs of basement level excavation.
- Portion of the site within flood breach area will be 'restricted to less vulnerable use only'.

Site 8: 110 Stamford Street SE1

B.3.12. The main points raised to the proposed approach for Site 8 were:

- Development should respect Iroko development
- Site should primarily be used for social housing
- Site should be developed for community uses
- Site allocation should include options of social housing and/or an extension to the Community Centre
- Site allocation is incompatible with landowner's objectives and is undeliverable
- Extra references to transport requested
- References should be added to river policies
- Welcome wording about planning obligations and flood protection
- No concerns about water supply or wastewater infrastructure

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

B.3.13. The main points raised to the proposed approach for Site 9 were:

- Site allocation should include a nursing home, for which demand exists
- Site allocation should accept meanwhile uses
- Preferred options are not accepted by the community or landowner
- More joint wording between council, community and landowner required

- 72 Upper Ground should be part of the site allocation; references should be added to decision letter for that site
- Site not appropriate for a tall building
- Welcome wording about planning obligations
- Technical wording change requested re. flooding
- Construction materials and waste must be transported by river
- References should be added to river policies
- References should be added to heritage assets
- Oversupply of offices in the area
- Proposed development would not be viable
- Can't assess impact on water supply or wastewater and sewage infrastructure
- Development needs to build on the current successful independent commercial uses
- Quantum of development proposed is too large and would be harmful
- Concern about impact on Bernie Spain Gardens
- Concern about impact on views

Site 17: 330-336 Brixton Road SW9

B.3.14. The main points raised to the proposed approach for Site 17 were:

- General support for site allocation/comprehensive redevelopment.
- There is no convincing overall vision for the combined sites/needs a comprehensive masterplan.
- Combination of sites not justified given different ownerships and uses.
- Addition of housing detrimental to existing business space on site.
- Object to the Council's high rise / high density model.
- The SADPD does not take into account issues which have emerged since the Local Plan 2021 was published, such as increases in building material costs, inflation, and other policy requirements affecting viability.
- Support retaining the façade of 'We are 336'
- Vehicle access for servicing or access to disabled persons' parking spaces should be from Winan's Walk.
- Disabled persons' parking on the Brixton Road may prejudice public realm improvements.
- Supportive of additional text on planning obligations to fund public realm improvements.
- Support improved footway along Winans Walk subject to maintaining servicing.

- Object to grass area along frontage along Brixton Road, this area must retain disabled parking.
- Biodiversity Net Gain and Urban Greening are incompatible with the high density / high rise development.
- Supports the identification of the petrol station as potential source of contamination.

Site 18: 300-346 Norwood Road SE27

B.3.15. The main points raised to the proposed approach for Site 18 were:

- General support for redevelopment of the site, particularly derelict sites such as the B&Q site and the petrol station, and the allocation for housing, especially affordable housing
- Support for the redrawing of the red line boundary of the site to the extent it removes existing housing from the site allocation
- Opposition to Site 18 being proposed for allocation and preference for it to be treated as a separate exercise
- Issues around the nature of the consultation and potential conflict with the pre-election period for the London Mayoral elections
- Potential flaws to the SADPD preparation process, including decision at Cabinet Members meeting and notification to stakeholders pursuant to Regulation 19
- Issues around scale and massing of the indicative approach and their effect on neighbouring properties and public realm as well as the setting of heritage assets
- Opposition to the loss of historic buildings within the site boundary, including the small independent businesses and housing units they host
- Issues around the public realm improvements proposed, including the widening of the pavement, the proposed public square and the amount of green space proposed
- Potential impact on local businesses within the site boundary and in the wider area
- Potential impact on local services, amenities and transport infrastructure, including public transport
- Potential impact of re-development on traffic for the duration of the works and beyond
- Issues around the viability of the proposal
- Concerns around sustainability and preference for retrofit over re-development

Site 20: Tesco, 13 Acre Lane SW2

B.3.16. The main points raised to the proposed approach for Site 21 were:

- Recognise the need for new housing/site suited to new development.

- Existing site does not contribute to the town centre.
- Area is already overpopulated.
- Proposal doesn't meet the needs of the local community or visitors to Brixton.
- Closure of supermarket will impact on employees and residents who shop there.
- The site allocation proposes too many homes/too high and too dense.
- Scale of development would harm nearby heritage assets/scale and mass out of character with surrounding context. Previous concerns not addressed.
- Without a maximum building height the site allocation would encourage speculation.
- Proposals will increase wind turbulence around site.
- Scale of proposals will result in unacceptable impact on amenity (daylight/sunlight, outlook, privacy, noise).
- Development should be scaled back. Reduced heights with greater setbacks from existing properties.
- Development should allow for more green spaces / playspaces.
- The current boundary wall height should be maintained to protect privacy. Proposal ignores 1985 planning condition to maintain boundary wall between Baytree Road and Arlington Lodge.
- Existing issues of anti-social behaviour could be exacerbated.
- Buildings to the south and west of the site should be townhouses and not flats.
- A courtyard design would maximise housing rather than a taller building.
- The current unsafe service access appears to be retained and is not properly addressed.
- Development will exacerbate congestion/parking issues.
- Tesco's Parking is an appreciated local benefit, important for visitors to town centre and tradesmen.
- An applicant will need to provide an evidence-based justification to justify any level of parking over and above London Plan standards.
- 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.
- Construction work will disrupt local residents.
- Commercial development should be limited to a use appropriate to residential area, e.g. no night clubs or bars.
- Development will turn into buy to let and AirBnB, or be left empty.
- Service charges will be unaffordable.

- Original objections on impacts on neighbours in terms of overlooking, enclosure and outlook have been ignored.
- The council has not provided a response to previous comments made at Reg 18.
- Community were not properly informed / consulted on proposals.
- Supportive of additional text which acknowledges bore hole and ground water protection.
- Scale of development raises significant environmental concerns/tall buildings less sustainable than lower ones.
- Loss of supermarket will result in additional car journeys and emissions.
- Brixton ranks second lowest for tree canopy cover.
- Development would exacerbate health issues.

Site 21: 51-65 Effra Road SW2

B.3.17. The main points raised to the proposed approach for Site 21 were:

- Support reduction in site area.
- Support allocation of site for redevelopment.
- Sheltered housing is not forthcoming on Site 14.
- Mosaic Centre must be safeguarded.
- Amend wording on Page 88 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.
- Employment floorspace should be placed in a separate block adjacent to the existing Link Business Centre to enable a wider range of employment activities.
- Retain mix of retail and light industrial at ground floor with housing above.
- SA policy is inconsistent with other policies in the LP, including the role of Brixton town centre in the hierarchy of town centres.
- Retail space should be retained in Brixton to prevent reliance on unsustainable out-of-town retail parks.
- Add text on 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).
- Consider pre-application discussions and increase unit range to 200 - 250 self-contained residential units (gross).

- Strongly opposed to an arbitrary height limit. Amend wording to "General building height 14m".
- 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, i.e. through viability assessment.
- Proposals are out of scale / character with surrounding context.
- Support acknowledgement of bore hole and recommendation to consider risks to groundwater sources associated with construction.
- Scale of proposals will result in unacceptable impact on amenity (daylight/sunlight, outlook, privacy, noise).
- Opportunity for green enhancements / significant biodiversity net gain.
- Car park should be removed.
- Development should be car-free, with restricted vehicle access for disabled persons' parking and servicing only.

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

B.3.18. The main points raised to the proposed approach for Site 22 were:

- Support for the replacement of existing industrial uses on the site and the provision of a mixed used development
- Mixed response regarding the reduced density proposed in the SADPD PSV relative to the Draft SADPD version and the associated reduction in the number of residential units proposed
- Building heights in the indicative approach are considered excessive for the context, likely to create overshadowing and overlooking issues with neighbouring buildings, as well as negatively impact on the setting of neighbouring Conservation Areas
- More flexibility would be welcome to allow large scale purpose built shared living accommodation
- Concerns around the co-location of industrial/business uses and residential uses within the site
- Concerns regarding capability of the existing public transport infrastructure to serve a new development of this scale

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

B.3.19. The main points raised to the proposed approach for Site 23 were:

- Support for the mixed-use redevelopment of the site and provision of retail uses at ground floor level
- Concerns around how the community will be integrated in the proposal and its relationship with retail uses at ground floor level
- Concerns regarding the operational use of the yard space proposed
- Improvements to public realm, i.e., widened pavement, are welcome, although quantum of green space proposed is considered insufficient
- Proposed building heights considered excessive for the context and likely to create overshadowing and overlooking issues with neighbouring buildings, as well as negatively impact on the setting of neighbouring Conservation Areas and views from Ruskin Park
- Concerns regarding capability of the existing public transport infrastructure to serve a new development of this scale
- Issues around the nature of the consultation

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

B.3.20. The main points raised to the proposed approach for Site 24 were:

- Concerns about the re-development negatively impacting traffic and parking in the area
- Indicative approach scale and massing likely to adversely impact the setting of the neighbouring Conservation Area and views from Ruskin Park
- Quantum of green space proposed is considered insufficient
- Issues around the nature of the consultation

Council's response to representations made pursuant to Regulation 20

B.4.1. The tables below include a summary of the representations received along with the Council's response and proposed changes to the SADPD. The proposed changes are generally expressed in the form of ~~striketrough~~ for deletions of text and underlined for additions of text.

B.4.2. A Schedule of Proposed Modifications has been published along this Consultation Statement and is available in the SADPD examination library (Ref. SD 03).

Site Allocation Development Plan Document – General Comments

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Welcome changes made to the plan.	Noted. No change required.	R0013	Greater London Authority (GLA)
Welcome requirements that Local Plan and London Plan parking standards will need to be met.	Noted. No change required.	R0014	Transport for London
Positive response to SADPD amendments.	Noted. No change required.	R0256	Helen Hayes MP
Positive comments on economic and general benefits of SADPD.	Noted. No change required.	R0019	Nathan Quinn
Encourage developers to liaise with Thames Water to be consistent with Local Plan.	Local Plan policies will continue to apply after adoption of the SADPD. No change required.	R0022	Thames Water
Should include green spaces which can be used to grow food and enhance biodiversity in all new developments. Cites LB Walthamstow's approach to food growing spaces and the positive impacts it can have in the community.	Local Plan Policy EN2 'Local food growing and production' addresses this point. it will remain in force after adoption of the SADPD and will apply to any relevant development proposals. No change required.	R0048	Victoria Sherwin
Should amend or remove development proposals.	This is summary text from the end of a representation that made various points about various sites. Each point is addressed under the relevant site allocation policy. No change required in direct response to this issue.	R0079	Alan Piper
SADPD does not mention how redeveloping / retrofitting / extending	The SADPD site allocations do not represent development proposals. Proposals could come forward in different forms and still be consistent with the site allocations. It is considered that adding a requirement to	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
existing buildings is more carbon friendly than demolition and rebuilding, as outlined in London Plan Guidance.	prioritise retention or retrofitting of existing buildings would constrain the ability of proposals to come forward for development of the sites. Sustainability and whole life cycle carbon emissions would be assessed as part of the development management process and differing priorities would be weighed up at that point. All proposals will be expected to show how they have incorporated relevant Local Plan and London Plan policies in relation to carbon/retrofit. No change required.		
Insufficient quantity of homes in the SADPD. Inconsistent with government aim to develop more residential units on brownfield sites. Note reduction in number of homes in the SADPD between reg 18 and reg 19 consultations; should reinstate these and maximise opportunities for social rent.	The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. This modelling has evolved as the SADPD has been developed, which has led to changes to the indicative quantum of development proposed for some sites. The quantum of development is considered appropriate and sound. No change required.	R0092	Green Group Councillors
SADPD has not kept pace with minimum standards in environmentally responsible development or the urgent need for social housing, and is unsound.	This is summary text from a representation that made various points about various sites. Each point is addressed under the relevant site allocation policy. No change required in direct response to this issue.	R0092	Green Group Councillors
SADPD does not meet NPPF and London Plan carbon emission aspirations. Wording needs to be stronger to enforce this. SADPD should be amended to be more consistent with the Whole Life Cycle Carbon assessment.	The SADPD site allocations do not represent development proposals and carbon emissions would be assessed as part of the development management process and relevant Local Plan and London Plan policies in relation to whole life carbon would be expected to be applied. Existing reference in each site allocation policy to Whole Life Cycle Carbon Assessment is considered sufficient. No change required.	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
No reference to Urban Forest Strategy. SADPD does not clarify developers' obligations to achieve the target score for Urban Greening Factor.	Urban greening factor is required by London Plan Policy G5. London Plan Guidance provides further details about how this should be achieved. The SADPD site allocations do not represent development proposals and any impacts on trees would be assessed as part of the development management process. No change required.	R0092	Green Group Councillors
SADPD language is not strong enough to communicate biodiversity net gain requirements.	Biodiversity net gain is a legal requirement. No change required.	R0092	Green Group Councillors
Consultation is difficult to understand and should include a map of sites.	As set out in the Consultation Statement, the council has drawn up the SADPD in line with and exceeding the requirements of the Local Plan Regulations and the Statement of Community Involvement. The SADPD includes a 'Map 1: Proposed Site Allocations' which shows the location of sites within the borough and also includes maps of individual sites. No change required.	R0002	Annegret Odwyer
Insufficient consultation	As set out in the Consultation Statement, the council has drawn up the SADPD in line with and exceeding the requirements of the Local Plan Regulations and the Statement of Community Involvement. No change required.	R0158	Sarah Boada-Momtahan
SADPD wording is complex.	As set out in the Consultation Statement, the council has drawn up the SADPD in line with and exceeding the requirements of the Local Plan Regulations and the Statement of Community Involvement. No change required.	R0024b	Matthew Pencharz
Object to Low Traffic Neighbourhoods.	Comment is not relevant to the subject matter of the SADPD. No change required.	R0024b R0239	Matthew Pencharz Rachael Shaughnessy
SADPD is inconsistent with [unspecified] original plans	Insufficient information provided to enable assessment of comment. No change required.	R0176	Gavin Goodhart
SADPD is not legally compliant, not sound, not compliant with duty to cooperate (without other comments)	The council has submitted what it considers to be a sound plan that is legally compliant and compliant with the duty to cooperate, as demonstrated in the PAS checklist and the Statement of Compliance with the Duty to Cooperate. Those seeking changes should demonstrate why the plan is unsound by reference to	R0009b R0018c R0101b	Micol Molinari Blandine Scalbert Jessye Sutton

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	one or more of the soundness criteria. Where such points have been made, they are considered under the individual issues. No change required in direct response to this issue.	R0111b R0127 R0135 R0137 R0138 R0139 R0151 R0175 R0190b R0205 R0206 R0233 R0235 R0238 R0240 R0241 R0244 R0255 R0311	Richard Marsh Jonathan Potts T Acton Kate Horton Anthony Casagrande Chloe Durrant Tim Allen Zoe Peet Paul Brewer Lucy Smith Amaia Carrascal Minino Alice Johnson-Harris C Nwok No name Jackie Parkin David Rose Louise MacGregor Andrew Dent Thomas Palmer
SADPD is legally compliant and compliant with duty to cooperate but not sound (without other comments)	Support for legal compliance and compliance with the duty to cooperate noted. The council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria. Where such points have been made, they are considered under the individual issues. No change required in direct response to this issue.	R0148	David Richards

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
SADPD is legally compliant but not sound and not compliant with duty to cooperate (without other comments)	Support for legal compliance noted. The council has submitted what it considers to be a sound plan that is compliant with the duty to cooperate, as demonstrated in the Statement of Compliance with the Duty to Cooperate. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria. Where such points have been made, they are considered under the individual issues. No change required in direct response to this issue.	R0115c R0194 R0252	Jane Pickard Kelly Eggleton Alistair McIntosh
SADPD is not sound (without other comments)	The council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria. Where such points have been made, they are considered under the individual issues. No change required in direct response to this issue.	R0178	Alex Despotovic
SADPD is sound (without other comments)	Noted. No change required.	R0220	Sarah Green
SADPD is legally compliant, sound, compliant with duty to cooperate (without other comments)	Noted. No change required.	R0027b R0181 R0201 R0204 R0234 R0242	Jan Brasching Amr El Sherif Robert Wright Tom Newsom Amaan Hafeez Gerard James Buggy
Confirm that Duty to Cooperate discussions have been helpful and ongoing.	Support noted. No change required.	R0265	London Borough of Croydon
SADPD is sound and amendments made are welcomed.	Noted. No change required.	R0284	Historic England
The rationale for sites that are included and excluded in SADPD is unsound. Waterloo Station	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	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Masterplan and 100 Woodgate Drive should be allocated.	plan as a whole. A separate Supplementary Planning Document for Waterloo Station will be prepared. No change required.		
100 Woodgate Drive should be added as a site allocation. If permitted, application 22/00300/FUL would sterilise development potential of land alongside the railway.	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. No change required.	R0305	AA Homes and Housing
Repeat of Regulation 18 request for extra sites to be added to the SADPD.	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. Responses to these site suggestions are set out in the Regulation 18 consultation statement. No change required.	R0283	Places for London
Land at Cancell Road should be added as a site allocation.	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. No change required.	R0293	Aquila Properties Ltd

Site 1: Royal Street SE1

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Concern that no uplift in residential units proposed.	Noted. The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. No change required.	R0293	Aquila Properties
A greater number of dwellings should be sought. The land should be considered as public sector land and a higher affordable housing requirement of 50% should be applied.	The London Plan defines public sector land as 'land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed'. This definition does not apply to this site, hence the affordable housing requirement is that for privately owned land, which is 35%. The quantum of development proposed for the site reflects the design-led optimisation requirement of the London Plan. No change required.	R0092	Green Group Councillors
Concern about impact on trees.	Any applicant designing a scheme for the site will be expected to do so in accordance with arboriculture best practice and any application will be tested against the relevant policies in the development plan. Development proposals will need to adhere to specific considerations. This includes the Root Protection Area (RPA) and canopy spread associated with Tree Preservation Order (TPO) No. 452, dated March 29, 2006, which safeguards two lime trees (designated T2 and T3) and twelve London plane trees (designated T1 and T4 through T14) located within Archbishops Park. Proposals will also be assessed against the prevailing version of BS 5837. The proposal must also demonstrate compliance with The National Planning Policy Framework, London Plan Policy G7 concerning trees and woodlands, and Local Plan Policy Q10 regarding trees. No change required.	R0092	Green Group Councillors
Recommend removal of reference to the 2005 modelled breach scenario for Canterbury House.	Agreed. PROPOSED CHANGE p.13 'Flood risk' section Amend first paragraph to read: "Wholly within the EA's Flood Zone 3 and 2100 Thames Tidal Breach Scenario, although the site of Canterbury House is outside the 2005 Thames Tidal Breach Scenario."	R0282	Environment Agency

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Tall building wording should reflect permission 22/01206/EIAFUL.	The site allocation has been developed to be fully policy compliant which includes causing no heritage harm. The planning permission referred to is a denser scheme which included a number of harmful heritage impacts. That heritage harm was considered to be outweighed by the public benefits brought by that scheme. Given the heritage harm, and without the ability to predict the public benefits of any future development on the site, it is considered that the allocation should continue to be based on 'no harm' scenarios. Schemes delivering harmful impacts, and their public benefits, will be tested against policy through the planning application process. No change required.	R0120	Guy's and St Thomas' NHS Trust
Support site allocation	Noted. No change required.	R0102	South Bank and Waterloo neighbours (SoWN)
Upgrades of the water supply network infrastructure are likely to be required. A housing phasing plan should be agreed. No infrastructure concerns regarding wastewater networks.	Developers will need to liaise with Thames Water as part of any development proposal. No change required.	R0022	Thames Water
Should specify a requirement to substantially reduce car parking on site.	London Plan parking policies are set out in the 'Transport, movement and public realm' section of the site allocation and will apply to any development proposal for this site. In particular, Local Plan Policy T6J states that parking provision in development proposals on existing car park and garage sites should comply with the standards for the uses proposed and should not seek to replace or re-provide the parking spaces that existed previously. No change required.	R0014	Transport for London
Should require contributions towards transport infrastructure.	The developer contributions sought will depend on the scale and form of development proposed, which is not specified in the policy. As a result the policy wording has been revised to ensure that the relevant policy considerations are highlighted, rather than to include specific mitigation measures that may or may not be required in practice. No change required.	R0014	Transport for London

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Should state that Lambeth Palace Road (not South Lambeth Road) forms part of the TLRN.	Agreed. PROPOSED CHANGE p.13 'Transport and access' section. Amend second bullet point as shown: " South Lambeth Road <u>Lambeth Palace Road</u> is part of the TfL Road Network (TLRN)".	R0014	Transport for London
Retention, retrofit or extension of existing buildings should be the starting point for consideration of this site. Support retention of Victorian school buildings and 10 Royal Street. Need to conform with London Plan Circular Economy Guidance.	Noted. Site allocation text already states that London Plan policy and guidance on Whole Life Cycle Carbon Assessments should be followed and requires development to be exemplary in meeting net zero carbon requirements. These requirements must be balanced against the London Plan policy requirement for design-led optimisation of sites. No change required.	R0092	Green Group Councillors
A description should be included of a 2007 permission for a mixed use development on the site.	Reference can be added to the historic planning permission for this site, to provide context. PROPOSED CHANGE p. 14 'Relevant planning history' section. Add new text to read: " <u>Land North And South Of Royal Street 05/01168/FUL - The demolition of the existing buildings and the erection of eight new buildings ranging in height from 20 to 5 storeys (generally reducing towards the park) to provide 641 residential units including (231 units - 407 bed spaces for key workers), a health facility (3,142 sq.m.) including a patients hotel, a nursery for NHS staff (766 sq.m.), accommodation for the families of sick children (1,780 sq.m.), ground floor retail and cafe uses (205 sq.m.), 209 off-street parking spaces, and associated landscaping, service and highway works. Granted 09/10/2007.</u> "	R0092	Green Group Councillors
Support principles of retaining C19 buildings and no tall buildings adjacent to Archbishop's Park.	Noted. No change required.	R0269	Waterloo Community Development Group

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Policies on loss of open space must be applied and certain pieces of open space should be shown in the context section.	<p>The site allocation already includes a reference to Local Plan Policy EN1 but this can be clarified. Treatment of open space including replacement for any existing open space proposed to be lost would need to be addressed in any development proposal.</p> <p>PROPOSED CHANGE p.23 'Access to open space and nature conservation' section. Amend first paragraph to read: "Development should <u>protect existing open space and</u> address existing open space deficiency and access to nature deficiency by meeting the requirements of Local Plan Policy EN1(e). The entrance to Archbishop's Park should be improved."</p>	R0269	Waterloo Community Development Group
Thames Policy Area should be included on maps.	<p>The Thames Policy Area is listed as a relevant policy designation and the plan must be read as a whole. It is considered that inclusion of this designation on the site plan would lead to clutter and visual confusion. No change required.</p>	R0065	Port of London Authority
Enhanced pedestrian connections to Thames Path should be shown.	<p>An enhanced pedestrian connection across Lambeth Palace Road is shown. This would provide a link towards the Thames and no further new connections are envisaged. No change required.</p>	R0065	Port of London Authority
Reference to riverbus services should be added. Reference to public access to the riverside should be added.	<p>Whilst the site is not adjacent to the Thames, references to London Plan and Local Plan policies relating to riverbus services and access to the riverside can be added.</p> <p>PROPOSED CHANGE p.21 'Transport, movement and public realm' section. Add text to end of first paragraph to read: "<u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u>"</p> <p>PROPOSED CHANGE p23 'Access to open space and nature conservation' section. Add new second paragraph to read: "<u>Development proposals are encouraged to explore opportunities for new, extended, improved and inclusive access to and from nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24.</u>"</p>	R0065	Port of London Authority

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
A Heritage Impact Assessment will be required for future development proposals.	The SADPD already notes this in the 'Heritage Assets' section. No change required.	R0284	Historic England
Should protect city farm by Archbishop's Park.	The city farm is a temporary 'meanwhile' use and is not protected by policy. No change required.	R0229	Katherine Roberts

Site 2: St Thomas' Hospital SE1

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Site suitable for key worker housing.	As a key part of the hospital campus this site is envisaged to be used for clinical purposes. If the landowner wished to develop key worker housing to support the clinical use this would be considered as part of a planning application. No change required.	R0092	Green Group Councillors
Site allocation should be wider. Development opportunities exist within the campus but outside of the site allocation boundary. Object to restrictions on height and extent of development.	The site allocation focuses on the main part of the hospital campus where a site allocation can add most value and where constraints need to be addressed. It does not preclude development coming forward on other parts of the campus. The Westminster World Heritage Site (WHS) is a very significant constraint and restrictions on the height and extent of development are considered justified in order to manage any impact on the WHS. No change required.	R0120	Guy's and St Thomas' NHS Trust
An unduly restrictive allocation could undermine the future potential of the site.	The site allocation focuses on the main part of the hospital campus where a site allocation can add most value and where constraints need to be addressed. It does not preclude development coming forward on other parts of the campus. The Westminster World Heritage Site (WHS) is a very significant constraint and restrictions on the height and extent of development are considered justified in order to manage any impact on the WHS. No change required.	R0120	Guy's and St Thomas' NHS Trust
Open green space on the site should be retained.	The site allocation requires the two significant groups of trees within the site to be retained, and for urban greening and enhancement of existing urban greening to be optimised. In combination these requirements will protect the existing green spaces. No change required.	R0092	Green Group Councillors
Wording about design life of buildings should be amended from "50-60 years for commercial" to "75 years for non-residential" to align with the updated national PPG. A flood risk activity permit (FRAP) will be required from the Environment Agency for	Agreed. PROPOSED CHANGE p.35 'Flood mitigation' section. Amend paragraph 7 to read: "All developments adjacent to a tidal flood defence must ensure the current and future statutory crest levels are maintained as outlined in the Thames Estuary 2100 plan and the condition of tidal wall defences provide a sufficient level of defence in accordance with the design life of the building (e.g. generally 100 years for residential and 50-60 years for commercial <u>75 years for non-residential</u>), and that a 16 metres setback is safeguarded for inspections, maintenance, future defence	R0282	Environment Agency

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
activities within 16m of a tidal main river or flood defence structure.	raising and potential replacement without increasing flood risk or encroaching on the river channel. <u>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.</u>		
Should specify a requirement to substantially reduce car parking on site.	London Plan parking policies are set out in the 'Transport, movement and public realm' section of the site allocation and will apply to any development proposal for this site. In particular, Local Plan Policy T6J states that parking provision in development proposals on existing car park and garage sites should comply with the standards for the uses proposed and should not seek to replace or re-provide the parking spaces that existed previously. No change required.	R0014	Transport for London
Should require contributions towards transport infrastructure.	The developer contributions sought will depend on the scale and form of development proposed, which is not specified in the policy. As a result, the policy wording has been revised to ensure that the relevant policy considerations are highlighted, rather than to include specific mitigation measures that may or may not be required in practice. No change required.	R0014	Transport for London
Should state that Lambeth Palace Road (not South Lambeth Road) forms part of the TLRN.	Agreed. PROPOSED CHANGE p.26 'Transport and access' section. Amend sixth bullet point as shown: " South Lambeth Road <u>Lambeth Palace Road</u> is part of the TfL Road Network (TLRN)".	R0014	Transport for London
Welcome site allocation and recognition of the site's potential to contribute to the MedTech cluster.	Noted. No change required.	R1020	Guy's and St Thomas' NHS Trust
Insufficient information to assess the impact the proposed site allocations will have on clean water infrastructure, waste water network	The location and indicative land uses are set out in the site allocation policy. The quantum of development is not specified in the policy and developers will need to liaise with Thames Water at the time of an application to enable an appropriate response to be given. Further detail around phasing of site allocations	R0022	Thames Water

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
infrastructure and sewage treatment works. Details are required of the location, type and scale of development together with the anticipated phasing.	is being updated as part of the annual review of the Housing Trajectory and will be included as a modification for each site allocation.		
Support for hospital development with retention of open space and set-back of buildings from the road. Appreciate acknowledgement of nearby heritage sites.	Noted. No change required.	R0120	South Bank & Waterloo Neighbours (SoWN)
Thames Policy Area should be included on maps.	The Thames Policy Area is listed as a relevant policy designation and the SADPD must be read as a whole. It is considered that inclusion of this designation on the site plan would lead to clutter and visual confusion. No change required.	R0065	Port of London Authority
Enhanced pedestrian connections to Thames Path should be shown.	An enhanced pedestrian connection across Lambeth Palace Road is shown. This would provide a link from the wider area towards the Thames and no further new connections are envisaged. No change required.	R0065	Port of London Authority
Reference to riverbus services and public access to the riverside should be added.	<p>Whilst the site is not adjacent to the Thames, references to London Plan and Local Plan policies relating to riverbus services and access to the riverside can be added.</p> <p>PROPOSED CHANGE p.34 'Transport, movement and public realm' section. Add text to end of first paragraph to read: "<u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u>"</p> <p>PROPOSED CHANGE p.36 'Access to open space and nature conservation' section.</p>	R0065	Port of London Authority

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Add new second paragraph to read: " <u>Development proposals are encouraged to explore opportunities for new, extended, improved and inclusive access to and from nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24.</u> "		
Restriction of development within 15m of Lambeth Palace Road adds unnecessary restriction.	Prescribing a building set-back from Lambeth Palace Road responds to previous consultation comments where concerns were raised about the cumulative impact on amenity of development of sites 1 and 2 and seeks to avoid a potential canyon-like effect. No change required.	R0120	Guy's and St Thomas' NHS Trust
A Heritage Impact Assessment will be required for future development proposals.	The SADPD already notes this in the 'Heritage Assets' section. No change required.	R0284	Historic England
There should be a comprehensive masterplan for the hospital campus based on a thorough understanding of the site and its surroundings.	A masterplan could be brought forward independently of the site allocation, but the site allocation plays a valuable role in setting initial parameters such as those to manage impact on the WHS. No change required.	R0294	Guy's and St Thomas' NHS Trust
Concern about cumulative impact of development of sites 1 and 2, which should be addressed together as one site allocation. Concern about building heights and impact on Westminster World Heritage Site. Concern at impact on Lambeth Palace Road (canyon with pollution and adverse effect on pedestrians).	Sites 1 and 2 have both been assessed for their impacts and text has been revised or added in both cases to reflect the significant constraint of the Westminster World Heritage Site. Policy wording has been developed with Historic England. It is not considered necessary to combine the two site allocations. Extra wording has been added to Site 2 to require a set-back of development from Lambeth Palace Road, which addresses the concern expressed about the road potentially becoming an unpleasant canyon. No change required.	R0269	Waterloo Community Development Group
Object to restrictions on building height. Very specific height restriction unnecessarily impacts the future	The high concentration of designated heritage assets, including the Westminster World Heritage Site, imposes a high degree of heritage constraints on development of this site and Site 1. As a policy document, the SADPD has been drawn up on the basis of 'no heritage harm' and wording to achieve this	R0120	Guy's and St Thomas' NHS Trust

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
<p>potential of this site and is overly obstructive. Parts of the site allocation are less sensitive and offer the potential for taller buildings. 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.</p>	<p>has been developed with significant input from Historic England. This includes restrictions on height that are considered necessary and justified given the level of heritage significance. Other potential development proposals that might take a different design approach can be considered on their merits at the point that a planning application is submitted. If they include harmful heritage impacts, under the current national policy position, public benefits may be used to outweigh less than substantial harm. No change required.</p>		

Site 3: 35-37 and Car Park Leigham Court Road SW16

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Support the redevelopment of the site for alternative uses.	Support noted.	R0029 R0169 R0278	Streatham Society Caroline Starkey Network Rail
Extension of the existing town centre to include the development site should be removed.	The front part of the site allocation comprising the disused toilet block and car park entrance is within the existing Streatham Town Centre boundary. The indicative modelling explores a maximum building height similar to that of the existing buildings on the opposite side of Leigham Court Road. Such an approach is considered reasonable. No change required.	R0145 R0153	John Fitzsimons Peter Moorhouse
Allocation states development would 'attractive gateway to town centre from the south', however, Streatham town centre is actually south of Leigham Court Road.	While the majority of Streatham Town Centre is located to the south of the site, Leigham Court Road provides access to Streatham Town Centre from the south-east of the borough.	R0169	Caroline Starkey
Site allocation fails to consider alternative uses for the site that would better serve the existing community's needs.	Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The SADPD follows these principles to help enable sustainable growth in new housing on sites that have potential for this use. The allocation does consider alternative uses alongside housing which would also serve the local community; new social infrastructure would be supported as part of a mixed-use development on this site. No change required.	R0300	Streatham Alliance
Proposals should be in keeping with height and bulk of buildings in the surrounding area.	Noted. It is considered that the allocation achieves that objective. No change required.	R0169	Caroline Starkey
Proposed building height (5-storey) at front of site is out of keeping with neighbouring buildings.	The site sits on the edge of Streatham Town Centre and inter-war development in that town centre stands opposite the site to a height of five and six storeys. It is considered that in this context, the scale and quantum of development identified in the allocation is appropriate and will reinforce the established town centre character. No change required.	R0125	Julian Heather

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Remove the wording redevelopment should respond to the height of existing buildings across the road to reinforce the character of the town centre. Building heights should be capped at 3 storeys in keeping with current adjacent & Leigham Court Estate conservation area norms.	Noted. Such an approach is not supported by the design evidence paper, document DE 03.	R0145 R0153	John Fitzsimons Peter Moorhouse
Building should not be visibly taller than 39-43 Leigham Court Road when viewed from the opposite side of the street within the Leigham Court Estate Conservation Area, or the rear of properties within the Leigham Court Estate Conservation Area.	Noted. Such an approach is not supported by the design evidence paper, document DE 03.	R0145 R0153 R0237	John Fitzsimons Peter Moorhouse Anon
Excessive massing to impact on views from Leigham Court Road Estate Conservation Area. Building heights are not clear.	Within the Design Evidence Paper three views were tested from within the Leigham Court Road (N) CA. These were views 5, 6 and 7. In those views the existing urban development of Streatham Town Centre is visible. The appearance of the indicative approach massing is comparable to the existing urban form and it is not considered that harm results to the significance (including setting) of the Leigham Court Road (N) CA. A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape. No change required.	R0029	Streatham Society
Impact of taller buildings on site on adjacent heritage assets not given sufficient consideration. Specifically, the introduction of taller buildings near to the Leigham Court Estate	The potential impact of development on this site is tested within the design evidence base. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances do not cause harm to sensitive receptors in the surrounding area. A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance	R0145 R0153 R0300	John Fitzsimons Peter Moorhouse Streatham Alliance

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Conservation Area and Leigham Court Road Conservation Area.	with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape. No change required.		
25-30 units for this 0.22ha site in highly connected area (PTAL 6a) could be seen as unambitious. Sites such as this should be maximised, where this is balanced with the existing environment and characteristics of the area.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for this location. The indicative quantum included in the draft allocation are approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. It will be for applicants and their architects to bring forward development proposals informed by the parameters set out in the site allocation policies and the rest of the policies in the development plan. No change required.	R0278	Network Rail
Does not identify residential neighbour at 33A Leigham Court Road, this incorrectly labelled as a "retail" unit, therefore fails to consider impacts such a loss of privacy, overshadowing, and noise pollution. Misrepresentation of property as retail undermines the validity of impact assessments.	<p>Noted. The Design Evidence Paper identifies the site's residential neighbours on p13, this includes specific reference to 33A Leigham Court Road which is located on the first floor above the retail parade. We acknowledge that this property was not correctly labelled in the Daylight and Sunlight Assessment, however, the impact of the indicative approach on this neighbouring property was properly considered during its preparation and the impact of the massing is shown on page 21 (Figure 17) of the report.</p> <p>Clarification added to 'Neighbour context' section proposed below.</p> <p>The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards' which protect against unacceptable impact on daylight / sunlight and overshadowing. Applicants will have to show how they have responded to sensitive neighbours in an acceptable manner.</p> <p>PROPOSED CHANGE p98. 'Neighbour context' section.</p>	R0300	Streatham Alliance

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Amend first paragraph to read: "The retail properties on the north side of Leigham Court Road between the site and Streatham High Road are generally single storey although 29–33 Leigham Court Road is two-storey, <u>with residential on the first floor.</u> "		
No confidence that design will be scrutinised.	Noted. The Council has an independent Design Review Panel and employs urban designers and conservation officers to scrutinise proposals at pre-application and application stage. There are robust design policies in both the London Plan and Local Plan which any future application will be tested against.	R0029	Streatham Society
Supportive of additional text on planning obligations to fund public realm improvements.	Support noted.	R0014	Transport for London
Policy text should clarify existing car parking to be removed and development car free, except for disabled persons' parking and servicing.	Agreed. PROPOSED CHANGE p.103 'Transport, movement and public realm' section. Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, <u>therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing.</u> "	R0014	Transport for London
Car park should be retained to ensure vitality of town centre, this will impact local businesses, residents, and people with mobility issues.	There is a need to encourage sustainable travel through Lambeth Local Plan Policy and Climate Action Plan goals. The site has a Public Transport Accessibility Level of 6a which is considered excellent. The area has good bus and train links which provide sustainable alternatives to private car use, and in doing so helps reduce congestion and road traffic. Blue badge parking is available on side streets across the town centre area, alongside pay by phone within CPZs.	R0125 R0300	Julian Heather Streatham Alliance
Supportive of the recommendation to consider risks to groundwater sources associated with deep construction works.	Support noted.	R0282	Environment Agency

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Supportive of the identification of the car park as a potential previous contaminative use of the site.	Support noted.	R0282	Environment Agency
Do not envisage infrastructure concerns regarding water supply networks in relation to this development. 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.	Noted. Developers will need to liaise with Thames Water when drawing up development proposals to ensure water supply and wastewater networks can support a scheme.	R0022	Thames Water
Do not envisage infrastructure concerns regarding wastewater networks in relation to this development. 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.	Noted. Developers will need to liaise with Thames Water when drawing up development proposals to ensure water supply and wastewater networks can support a scheme.	R0022	Thames Water
Redevelopment threatens existing habitats on site, breaching environmental regulations and contradicting policies aimed at sustainable design, conserving biodiversity, and urban greening.	The site allocation identifies the adjacent Site of Importance for Nature Conservation (SINC 14 - Railway Lineside Streatham Hill) abuts the site. Protecting and enhancing biodiversity and existing habitats in Lambeth is a key objective of the Council. London Plan Policy G6 and Local Plan Policy EN1 seek to protect, enhance, create and/or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy. Local Plan Policy EN1 resists development that would result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space unless adequate mitigation or compensatory measures are included, appropriate to the nature conservation value of the assets involved. Policy G6 sets	R0300	Streatham Alliance

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	out that Sites of Importance for Nature Conservation (SINC) should be protected. London Plan Urban Greening Factor (PolicyG5) requirements will apply. In addition, the new Biodiversity Net Gain requirements in the Environment Act 2021 will apply to any future planning application at this site. This will require new development to achieve a 10% net gain in biodiversity. No change required.		
The consultation process was flawed due to technical issues, therefore this did not comply with statutory requirements. Local residents and businesses were not accurately informed, and therefore were prejudiced.	The Council has acknowledged this issue and re-opened Regulation 19 consultation on the SADPD for an additional 8 weeks between 18 June and 13 August 2024. Consultation has been undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement 2020. Further details are set out in this Reg 22 Consultation Statement.	R0300	Streatham Alliance
Sustainability Appraisal and related evidence based flawed due to failure to identify residential property at 33A Leigham Court Road.	<p>Noted. The Design Evidence Paper identifies the site's residential neighbours on p13, this includes specific reference to 33A Leigham Court Road which is located on the first floor above the retail parade. We acknowledge that this property was not correctly labelled in the Daylight and Sunlight Assessment, however, the impact of the indicative approach on this neighbouring property was properly considered during its preparation and the impact of the massing is shown on page 21 (Figure 17) of the report. The Sustainability Appraisal was therefore not flawed and was undertaken in a manner consistent with legislation and guidance. Clarification has been added to neighbour context proposed below.</p> <p>PROPOSED CHANGE p98. 'Neighbour context' section.</p> <p>Amend first paragraph to read: "The retail properties on the north side of Leigham Court Road between the site and Streatham High Road are generally single storey although 29–33 Leigham Court Road is two-storey, <u>with residential on the first floor.</u>"</p>	R0300	Streatham Alliance

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

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Support allocation of site / principle of redevelopment.	Support noted.	R0003 R0008 R0088 R0097 R0276	Stephen Croce Brian Clivaz Jon Barker Stop the Blocks Unite Group PLC
Site allocation would make a more efficient use of existing land.	Support noted.	R0276	Unite Group PLC
Support new housing and affordable housing.	Support noted.	R0131	Anthony Cowan
Welcome alignment with local plan	Support noted.	R0013	GLA
Deliver Purpose Built Student Accommodation-led mixed-use scheme comprising replacement industrial and community space presents the optimal solution for delivery considering site constraints.	Support noted.	R0276	Unite Group PLC
Light industrial capacity should be significantly increased.	A no net loss approach to industrial land is considered more appropriate when considering other objectives, such as re-providing social infrastructure and delivering new housing. Capacity for increasing industrial floorspace is likely to be limited, when having regard to servicing requirements and potential impact on transport network, alongside viability constraints. No change required.	R0092	Green Group Councillors
Reduction in residential units from the draft SADPD to the SADPD PSV shows a lack of ambition, this should revert back to previous position. Housing target should be more	Noted. The quanta set out in the SADPD are approximate, informed by high-level testing of the optimum level of development that could in principle be accommodated on the sites. The quanta of development on this site was reduced following further daylight / sunlight testing between Reg 18 and Reg 19 consultation. The indicative quantum included in the allocation are approximate and should not be read as	R0120	G&ST NHS Trust

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
ambitious given the challenging mix of land uses envisaged on site.	absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site.		
Proposed quanta rely on existing NHS facilities being reprovided off-site.	Noted. This is recognised within the SADPD and supporting evidence base and is based on past discussions with NHS service planners.	R0293	Aquila Properties
Scale and massing of proposals not in keeping with the existing low-rise context and character of the area. This would be contrary to Chapter 12 NPPF, London Plan Policy D3, and Local Plan policies H1 and Q5.	The combination of surviving Victorian buildings, post-war estates and recent developments, makes for a varied context with very little consistency in scale, whilst there is considerable variety in building heights locally. The existing context and local character of the site is set out in Section 2 of the Design Evidence Document. Given this variety, and following testing of the 'indicative approach' (which it must be remembered is not a proposal in itself) it is considered that a modest tall building of up to c50m can be accommodated. The assessment of the indicative approach is set out in Section 5 of the Design Evidence Document. No change required.	R0088 R0097 R0131 R0134 R0214 R0215 R0253 R0257	Jon Barker Stop the Blocks Anthony Cowan Harminder Brainch Barry Timms Konstantin Andrejev Zackary Puttock Aurelie Hulse
Site allocation does not properly consider the requirements of the ECOA Framework and Pullens Estate Conservation Area, as applied by the Woodland's Nursing Home scheme.	Documents prepared by adjoining boroughs can only be given limited weight as they have been prepared under a different policy context (Southwark's not Lambeth's). The Woodlands Nursing Home site, with its secluded location and particularly challenging low-rise neighbour relationships, has much in common with the Pullens Estate Character Area. That scheme went to Public Inquiry and Lambeth Council case relied in part on the Pullens Character Area analysis to resist the scheme. For this Allocation, consideration has been given to the site's wider context and character, including the content of Southwark Council's ECOA Framework and its Pullens Estate Character Area. However, this allocation site is located on a main road, has light industrial uses and is in a more varied urban context. It has much less in common with the Pullens Estate Character Area than the Woodlands Nursing Home site. It should be noted that Southwark Council has not raised concerns on this matter.	R0088 R0097 R0134	Jon Barker Stop the Blocks Harminder Brainch
Site is outside the Elephant and Castle Cluster, therefore a tall building is not acceptable.	Noted. Site allocations documents, such as this one, are an acknowledged means of identifying locations as suitable for tall building development. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 A of the Local Plan and associated London Plan policies.	R0214	Barry Timms

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Cottington Close and Cotton Gardens Estate are outliers in the surrounding area, and do not represent the prevailing context of the area.	The context and local character of the site is considered in Section 2 of the Design Evidence Document. We consider the combination of surviving Victorian buildings, post-war estates and recent developments, makes for a varied context with very little consistency in scale, whilst there is considerable variety in building heights locally.	R0088	Jon Barker
The site is not identified as being suitable for a tall building in the local plan.	Site allocations documents, such as this one, are an acknowledged means of identifying locations as suitable for tall building development. Lambeth Local Plan Q26B allows for tall buildings in locations specified in Annex 10 of the Local Plan or in a Site Allocation. Any tall building proposal that comes forward on this site would be assessed on its merits against policy Q26 of the Local Plan and associated London Plan policies.	R0088	Jon Barker
Site not suitable for a tall building.	<p>Testing in the design evidence shows that the site is appropriate for a tall building. An optimisation of the site will enable the site to deliver various public benefits not otherwise achievable given the site's complex land use requirements.</p> <p>The evidence document to support the site allocation included views testing of the indicative approach in an accurate 3D model. This was to aid an understanding of likely impacts on daylight / sunlight, amenity, and heritage and townscape. The conclusion of that assessment was that the tall building in the indicative approach (c50m) would not have unacceptable impacts. Where the indicative approach has subsequently been revisited the impact assessments have been re-done. Again, the findings are that the heritage impacts are acceptable. Assessment has also concluded that the massing and height are generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours and to the quality of new residential accommodation on the site.</p> <p>Any tall building proposal (45m and above in this locality) that comes forward on this site would be assessed on its merits against policy Q26 of the Local Plan and associated London Plan policies. It would also be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3</p>	<p>R0088</p> <p>R0097</p> <p>R0131</p> <p>R0134</p> <p>R0214</p> <p>R0215</p> <p>R0253</p>	<p>Jon Barker</p> <p>Stop the Blocks</p> <p>Anthony Cowan</p> <p>Harminder Brainch</p> <p>Barry Timms</p> <p>Konstantin Andrejev</p> <p>Zackary Puttock</p>

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').		
A tall building will set a precedent for more tall buildings along Kennington Lane.	Lambeth Local Plan Q26B allows for tall buildings to come forward outside those locations specified in Annex 10 of the Local Plan or in a Site Allocation. That means that potentially tall buildings could come forward along Kennington Lane irrespective of this site allocation. Any scheme that was to come forward would be judged on its merits against the development plan and any other material planning considerations.	R0214 R0215 R0253 R0257	Barry Timms Konstantin Andrejev Zackary Puttock Aurelie Hulst
Does not properly consider reasonable alternatives, including low/mid-rise options for the site.	Having regard to the complex land use requirements on this constrained site, low/mid-rise options are not considered to provide a reasonable alternative. In light of views and heritage impact testing, a moderately scaled tall building (c50m) is considered to be the most appropriate way to optimise densities on this site in accordance with London Plan Policy D3.	R0088 R0097 R0134	Jon Barker Stop the Blocks Harminder Brainch
More detailed tall building study should have been undertaken.	The evidence gathered to inform this Site Allocation policy is robust and is considered proportionate to the site context. It is important to note that the site allocation itself is not a formal development proposal. Any applicant proposing to develop the site will have to undertake their own tall building studies, informed by heritage impact assessments. Their proposals will be scrutinised through the planning application process and tested against relevant planning policy in both the London Plan and Local Plan.	R0088 R0215	Jon Barker Konstantin Andrejev
LB Southwark does not consider Site 7 appropriate for a tall building as it is not within the established tall building cluster at Elephant and Castle, and is not located at a point of landmark significance. (Representation 1)	Following receipt of this comment, Officers from Lambeth met again with design and conservation officers at Southwark to discuss this comment and to provide a summary of the design evidence for Site 7. Officers from Southwark agreed they had no further concerns regarding the height and massing for SA7 and the site may be appropriate for a tall building, subject to further testing of views at application stage. Officers agreed that any potential application for this site should ensure future development does not cause adverse impact on the character, appearance and setting of any heritage assets. Southwark agreed to confirm this point in an updated statement of representation (comments provided below). Consideration and agreement on this matter is also set out within the signed Statement of Common Ground between the LB Lambeth and LB Southwark, which is available within the SADPD Examination Library.	R0285	LB Southwark

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
While LB Southwark has 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. (Representation 2)	Noted. Reference to nearby Conservation Areas in Southwark will be added to the 'Heritage assets' section. See below response for further details.	R0285	LB Southwark
LB Southwark requests that the West Square Conservation Area and Elliot's Row Conservation Area are included in the heritage assets section of the site allocation policy.	Agreed. PROPOSED CHANGE p.123 'Heritage assets' section. After the first sentence add: <u>"To the north of the site are the West Square Conservation Area and Elliot's Row Conservation Area."</u>	R0285	LB Southwark
Does not properly consider potential harm to heritage assets, such as the Old Fire Station, Magistrates/Old Courthouse (Jamyang Centre), Renfrew Road Conservation Area. Heritage harm likely.	Full consideration has been given to the settings of heritage assets in the site's immediate and wider context. This is documented within the Design Evidence paper for Site 7 – para. 5.13 describes each heritage asset in detail and the effect the indicative approach has on it. That assessment was informed by an assessment of key views where the heritage assets are particularly sensitive. 24 views were tested in total and the vast majority of those were selected for their heritage sensitivity. The conclusion reached is that the indicative approach would not have an unacceptable effect on heritage asset settings.	R0060 R0088 R0097 R0171 R0214 R0253 R0257	Tony Millson Jon Barker Stop the Blocks Visakha Chandrasekera Barry Timms Zackary Puttock Aurelie Hulse
Heritage harm outweighs public benefit.	The site allocation is predicated on a 'no harm' approach to heritage assets. The indicative approach that has informed site capacity is based on that assumption, and it is considered that a scheme compliant with the site allocation could cause no heritage harm.	R0097 R0134	Stop the Blocks Harinder Brainch

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Cottington Close Estate is not designated as a Conservation Area. Its identification as a potential future CS within the SAPDD PSV is premature and should be removed.	<p>The Twentieth Century Society's 2017 Conservation Area project identifies the Cottington Close Estate as a potential candidate as a post-war conservation area. Lambeth's heritage officers, having viewed the estate, consider the C20s assertion to be a reasonable one. It therefore seems only reasonable to flag in the site allocation given its proximity. As a minimum, in the planning process, Cottington Close Estate should be treated as a Non-Designated Heritage Asset.</p> <p>PROPOSED CHANGE p.123 'Heritage assets' section.</p> <p>Amend the final paragraph to read: "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. The <u>Cottington Close Estate to the South has been identified in the Twentieth Century Society's 2017 Conservation Area Project as a potential candidate as a post-war conservation area."</u></p>	R0276	Unite Group PLC
Text within design evidence regarding former 'workhouse wall' should be replicated in the SADPD.	<p>Noted.</p> <p>PROPOSED CHANGE p.129 'Heritage Assets' section.</p> <p>Add final paragraph: <u>"The stock brick wall separating the two parts of the site is a remnant of the old workhouse but its outside the conservation area and isolated from all the surviving historic buildings. Given its limited historic interest, it is not considered to be a heritage asset."</u></p>	R0276	Unite Group PLC
Cottington Close Estate incorrectly referred to as Cottingham Close.	<p>Noted. See also response to comments from Aquila Properties (R0293).</p> <p>PROPOSED CHANGE p.123 'Heritage assets' section.</p> <p>Amend the final paragraph to read: "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. The <u>Cottington Close Estate to the South has been identified in the Twentieth Century Society's 2017 Conservation Area Project as a potential candidate as a post-war conservation area."</u></p>	R0088	Jon Barker

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Not consistent with Para 124 of NPPF, upward extensions are only supported where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene.	This text referred to is taken from Part E) of Paragraph 124 and is only relevant to upward extensions of existing buildings. While regard has been had to the surrounding context, the relevant Para 124 Part D does not require new development proposals on brownfield land to be consistent with the prevailing height and form of neighbouring properties.	R0097 R0134	Stop the Blocks Harminster Brainch
Similar residential density can be achieved without tall building (similar to Newington Butts scheme).	The site has significantly more complex land use requirements than the adjacent Newington Butts scheme, in terms of delivering no net loss of industrial land, re-providing of community floorspace, as well as contributing to the delivery of new residential development. In light of views and heritage impact testing, a moderately scaled tall building (c50m) is considered to be the most appropriate way to optimise densities on this site in accordance with London Plan Policy D3.	R0060 R0088 R0092 R0131 R0214 R0215 R0253	Tony Millson Jon Barker Green Group Councillors Anthony Cowan Barry Timms Konstantin Andrejev Zackary Puttock
Height of buildings will overshadow local homes, causing daylight / sunlight issues.	The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any application that comes forward on the site will be tested against amenity in accordance with Local Plan Policy Q2 which protects against unacceptable impact on levels of daylight and sunlight. Applicants will have to show how they have responded to sensitive neighbours in an acceptable manner.	R0060 R0088 R0092 R0097 R0131 R0171 R0214 R0215 R0253	Tony Millson Jon Barker Green Group Councillors Stop the Blocks Anthony Cowan Visakha Chandrasekera Barry Timms Konstantin Andrejev Zackary Puttock

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0257	Aurelie Hulse
Day light / sunlight falls below BRE Guidance requiring all existing rooms to have a retained minimum VSC level of 27%.	Any applicant developing a scheme would be required to ensure that the neighbour impacts are acceptable in line with Local Plan Policy Q2 which protects against unacceptable impact on levels of daylight and sunlight. Applicants will have to show how they have responded to sensitive neighbours in an acceptable manner.	R0097 R0134	Stop the Blocks Harminster Brainch
The Daylight / Sunlight report does not consider potential impacts of the proposed development on neighbouring properties to the north and east of the site. Goddard House is omitted.	Noted. The consultant which undertook the Daylight / Sunlight assessment has confirmed that Goddard House experiences minor change to its VSC from the existing and proposed scenario based on their façade study. Whilst there is some change, retained levels are circa 15% and above which is considered reasonable for this location.	R0088 R0097 R0134 R0214 R0215	Jon Barker Stop the Blocks Harminster Brainch Barry Timms Konstantin Andrejev
Enclosure and overlooking will cause to privacy issues for neighbouring residents.	It is important to note that the site allocation itself is not a formal development proposal. The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0060 R0088 R0097 R0214 R0215 R0253 R0257	Tony Millson Jon Barker Stop the Blocks Barry Timms Konstantin Andrejev Zackary Puttock Aurelie Hulse
Noise impact for neighbouring residents.	The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any development would be required to protect local amenity in accordance with Local Plan Policy Q2, ensuring adverse impact of noise are reduced to an acceptable level through the use of attenuation, distance, screening, or layout/orientation in accordance with London Plan policy D14. The impact of any demolition and construction will be	R0060 R0088 R0097 R0214	Tony Millson Jon Barker Stop the Blocks Barry Timms

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development.		
Incorporation of pavement widening / cycle lane supported.	Support noted.	R0003	Stephen Croce
Supportive of additional text on planning obligations to fund public realm improvements. This should be expanded to refer to active travel connections, cycle hire provision and buses.	Support noted. PROPOSED CHANGE p.130 'Transport, movement and public realm' section. Amend final paragraph to read: "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, <u>active travel connections, cycle hire provision and buses.</u> "	R0014	Transport for London
Support updates to transport section to regarding servicing.	Noted, the 'Transport, movement and public realm' section requires that "Any partial redevelopment of the site should ensure that later phases can also be serviced from Kennington Lane rather than Dugard Way."	R0014	Transport for London
Site allocation should enable the continued safe and accessible services at Wooden Spoon House should development on other parts of the site come forward first	Noted, the 'Transport, movement and public realm' section requires that "Any partial redevelopment of the site should ensure that later phases can also be serviced from Kennington Lane rather than Dugard Way."	R0120	G&ST NHS Trust
Access from Kennington Lane is not suitable, this will exacerbate existing traffic/congestion issues.	Development will be expected to be car free. A transport assessment will be required for any future planning applications at this site.	R0060 R0088 R0097 R0131 R0171	Tony Millson Jon Barker Stop the Blocks Anthony Cowan Visakha Chandrasekera

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0214 R0215 R0253	Barry Timms Konstantin Andrejev Zackary Puttock
There should be no access from Duggard Way during construction and operation.	Noted. All servicing is expected to be accommodated on site and accessed from Kennington Lane.	R0253	Zackary Puttock
Access road between Wooden Spoon House forms part of the Water Tower development, no confirmation from Water Tower Management to confirm access to Woodlands from Kennington Lane. Similar access arrangements previously denied for Woodlands proposal.	Renfrew Road is intended to be retained as the primary north-south pedestrian route. Any pedestrian access linking Kennington Lane and Duggard way would be provided within the site's boundary.	R0088 R0097 R0134	Jon Barker Stop the Blocks Harminster Brainch
Uses linked to last mile distribution/logistics or 'just-in-time' servicing should utilise cargo bikes and minimise the need for vehicle access.	PROPOSED CHANGE p.130 'Transport, movement and public realm' section. Amend fourth paragraph to read: "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. 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. <u>Where land use is linked to last mile distribution/logistics or 'just-in-time', servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u> "	R0014	Transport for London
Transport section should state development to be car free.	PROPOSED CHANGE p.130 'Transport, movement and public realm' section.	R0014	Transport for London

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, <u>therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing.</u> "		
Potential for phased development is welcomed.	Support noted.	R0120	G&ST NHS Trust
Site vision will rely on a phased approach.	Noted. This is recognised within the SADPD and supporting evidence base.	R0293	Aquila Properties
Site allocation should recognise site is 'likely' to come forward in two phases given ownership. Amend wording from 'may' to 'is likely to come forward in phases'.	Proposed change not accepted. We consider the current wording provides sufficient flexibility for a phased approach.	R0276	Unite Group PLC
Tall buildings on site would have a higher embodied carbon than lower rise buildings.	Comment noted, however, a tall building may enable benefits which could not otherwise be realised through a low to mid-rise development on this site, delivering a higher density development on a limited footprint. A tall building would make a more significant contribution towards delivering new homes, while enabling the reprovision of employment and social infrastructure uses, in an area with excellent public transport accessibility, alongside access to services and amenities. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation. All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy. No change required.	R0088	Jon Barker
Inclusion of basement significantly raises embodied carbon.	Noted. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation. All existing and emerging policy,	R0088	Jon Barker

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.		
Viability report does not take into account costs of basement level excavation.	Representation refers to the Council's ambition to include a basement in this scheme, yet no cost is provided for this in the FVA. Suggestion that a basement extending to half the site would be required, which would equate to 3,300 square metres. This would significantly exceed what would be required for disabled car parking and plant. A space no more than one third of this would be required and this could readily be accommodated within the surplus generated by the scheme. No change required.	R0088	Jon Barker
Land use requirements relating to industrial land and public space will affect viability and justify additional building height.	Noted. These different land use quanta have been considered as part of the viability evidence for this plan.	R0088	Jon Barker
Development density will need to be far higher to make the plan viable.	Viability testing has been undertaken for all sites within the SADPD. The proposed land uses and quantum for this site were found to be viable.	R0134	Harinder Brainch
Portion of the site within flood breach area will be 'restricted to less vulnerable use only'; Currently no approved strategy to relocate NHS use off-site - this should be clarified within the Flood Risk section.	Agree to make this clarification within the flood risk mitigation section. PROPOSED CHANGE P131 'Flood risk mitigation' section. After the fourth paragraph add: <u>"The NHS facilities are considered a "More Vulnerable Use", any re-provision of this use on site would need to satisfy the exceptions test as part of a Flood Risk Assessment."</u>	R0282	Environment Agency
Do not envisage infrastructure concerns regarding wastewater networks in relation to this	Noted. Developers will need to liaise with Thames Water when drawing up development proposals to ensure water supply and wastewater networks can support a scheme.	R0022	Thames Water

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
development. 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.			

Site 8: 110 Stamford Street SE1

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Development should relate to neighbouring sites including Iroko and should not overshadow or overlook private open amenity space there.	The text on 'Neighbour relationships' already states that 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. No change required.	R0092 R0269	Green Group Councillors Waterloo Community Development Group
Transport and access context should state that Stamford Street forms part of the TLRN. Welcome wording about planning obligations.	Noted and agreed. PROPOSED CHANGE p.39 'Transport and access' section. Add new sixth bullet point to read: " <u>Stamford Street is part of the TfL Road Network (TLRN)</u> "	R0014	Transport for London
Welcome policy wording about less vulnerable and more vulnerable uses.	Noted. No change required.	R0282	Environment Agency
Comments about site history and delivery of housing in the area. The site should be primarily for social housing.	The site is allocated for approximately 30 homes at upper floor levels. The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. Any development proposal would be expected to deliver a proportion of affordable housing in line with London Plan policies H4 and H5 and Local Plan policy H2. No change required.	R0092	Green Group Councillors
Reference to riverbus services should be added. Reference to public access to the riverside should be added.	Whilst the site is not adjacent to the Thames, references to London Plan and Local Plan policies relating to riverbus services and access to the riverside can be added. PROPOSED CHANGE p.45 'Transport, movement and public realm' section.	R0065	Port of London Authority

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>Add text to end of first paragraph to read: "<u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u>"</p> <p>PROPOSED CHANGE p.46 'Access to open space and nature conservation' section.</p> <p>Add new second paragraph to read: "<u>Development proposals are encouraged to explore opportunities for new, extended, improved and inclusive access to and from nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24.</u>"</p>		
Social housing should be specified in the SADPD as an option. 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.	The site is allocated for approximately 30 homes at upper floor levels with the option of community space at ground floor level. The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. Any development proposal would be expected to deliver a proportion of affordable housing in line with London Plan policies H4 and H5 and Local Plan policy H2. No change required.	R0102	South Bank & Waterloo Neighbours (SoWN)
No infrastructure concerns regarding water supply network infrastructure or wastewater networks.	Noted. No change required.	R0022	Thames Water
Site allocation is incompatible with landowner's objectives and is undeliverable.	There is a proven need for housing including affordable housing in Lambeth and all suitable sites need to play their part in enabling its delivery. The capacity of each site has been tested through modelling. The impacts of the proposed quantum of development on neighbouring sites have been assessed and found	R0275	Coin Street Community Builders (CSCB)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	to be acceptable. This approach reflects the London Plan requirement of 'design-led optimisation'. The site allocation allows for a blend of community floorspace and housing to balance competing needs in the area. No change required.		
Adjoining neighbourhood centre was designed to be extended onto the site allocation and does not contain sufficient space. Landowner wishes to develop the site for community uses.	Noted. The site allocation allows for community uses at ground floor level. No change required.	R0275	Coin Street Community Builders (CSCB)
The site could only accommodate a maximum of 20 dwellings if developed for housing.	The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. No change required.	R0275	Coin Street Community Builders (CSCB)
SADPD viability study does not include the option of community space or active frontage uses and so is unrealistic.	Planning Policy Guidance requires the Council to consider planning viability on an applicant neutral basis. The viability study for Site 8 shows a surplus when residual land values are compared to benchmark land values, such that alternative uses could be accommodated within the figure. No change required.	R0275	Coin Street Community Builders (CSCB)
Provision of community uses would obviate the need to comply with Local Plan Policy S2 or open space policy.	Policy references in the site allocation are included to ensure that policy requirements are complied with. If a development proposal comes forward it will be assessed against those policies and if provision of community space satisfies the requirements of Local Plan Policy S2 then the proposal will be compliant. Since the site allocation allows for differing forms of development, the policy references are required to ensure that policy requirements are complied with. No change required.	R0275	Coin Street Community Builders (CSCB)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Use of River Thames to transport materials and waste during construction is unrealistic.	Use of the river to transport materials and waste during construction is considered to be a justified aspiration. The site allocation acknowledges that this is only to happen where possible and does not require it in all cases. No change required.	R0275	Coin Street Community Builders (CSCB)
Site should be used for social housing. Ground floor could be used for community uses but more social infrastructure in this part of the borough would be inappropriate.	The site is allocated for approximately 30 dwellings at upper floor levels with the option of community space at ground floor level. The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. Affordable housing policies in the adopted development plan would apply. No change required.	R0269	Waterloo Community Development Group

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

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Site allocation should include option of a nursing home / Suggestion that demand exists for a nursing home	<p>Landowner has confirmed that the site will not be developed for at least 10 years. it is agreed that the need for a nursing home should be assessed at that time and the policy be amended to enable that option.</p> <p>PROPOSED CHANGE p.54 'Land uses' section.</p> <p>Amend last sentence of paragraph 1 to read: "This may include an element of extra care housing <u>or a nursing home</u> where need is demonstrated."</p>	<p>R0038</p> <p>R0059</p> <p>R0083</p> <p>R0095</p> <p>R0102</p> <p>R0110</p> <p>R0269</p> <p>R0275</p>	<p>Neil McFarland</p> <p>Jan Falkingham</p> <p>Carole Milner</p> <p>Paul Field</p> <p>South Bank and Waterloo Neighbours (SoWN)</p> <p>Helen Webb on behalf of Pearman St Co-operative Ltd</p> <p>Waterloo Community Development Group</p> <p>Coin Street Community Builders (CSCB)</p>
Support site allocation provided the possibility of a nursing home is added.	Noted. See response to representation above 'Site allocation should include a nursing home'.	R0102	South Bank and Waterloo Neighbours (SoWN)
Preferred options are not accepted by the community or landowner/ Without a nursing home, the site allocation does not reflect the desires of the landowner or the local community.	Noted. See response to 'Site allocation should include a nursing home'.	<p>R0083</p> <p>R0102</p>	<p>Carole Milner</p> <p>South Bank & Waterloo Neighbours (SoWN)</p>

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Council has not offered alternatives to a nursing home.	The council's priority is to allow residents needing care to remain in their own homes for as long as possible. This is reflected in the previous addition of text that allowed for the possibility of extra care housing on the site. See response to 'Site allocation should include a nursing home'.	R0083	Carole Milner
Distinction between a nursing home and other forms of residential care is unclear in documentation.	New policy wording is proposed to clarify that a nursing home could be developed if need was demonstrated. See response to 'Site allocation should include a nursing home'.	R0083	Carole Milner
Council is not ensuring that people can stay within their communities when they need to move into a nursing home.	Noted. See response to 'Site allocation should include a nursing home'.	R0083	Carole Milner
Assessment of need for a nursing home is out of date.	The Council's current evidence indicates that there is not demand for a nursing home at this time in the northern part of the borough. See response to 'Site allocation should include a nursing home'.	R0083	Carole Milner
Welcome confirmation that planning obligations may include contributions towards the Spine Route.	Noted. No change required.	R0014	Transport for London
60-72 Upper Ground should be added to the site allocation / Question why 60-72 Upper Ground is not part of the site allocation.	It is not necessary to have a site-specific allocation for every potential development site. When the SADPD was being drawn up, a planning application for 72 Upper Ground was at an advanced stage. It was considered that the outcome of the call-in inquiry for that site would provide the context and steer required to enable the site's development to be progressed and that, consequently, a site allocation was no longer required. No change required.	R0082 R0102	MEC London Property 3 (General Partner) Limited South Bank and Waterloo Neighbours (SoWN)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Should add reference to lapsed permission for 60-72 Upper Ground site, and planning history should be amended to reflect the current permission status.	<p>Agreed that details of the permission should be included. The SADPD does not note whether permissions for any other sites have been implemented or have lapsed and so it would be inconsistent to make such an observation here.</p> <p>PROPOSED CHANGE p.51 'Relevant planning history' section.</p> <p>Under 'Adjacent to the site – 72 Upper Ground' add new text to read: "<u>17/03986/FUL 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. Granted 03/05/2018.</u>"</p> <p>PROPOSED CHANGE p.51 'Relevant planning history' section.</p> <p>Amend text as follows: "21/02668/EIAFUL – 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. Decision pending Approved 04/03/2024."</p>	R0082	MEC London Property 3 (General Partner) Limited
Decision letter for 21/02668/EIAFUL notes that 60-72 Upper Ground site is suitable for tall buildings.	<p>Noted. 60-72 Upper Ground is not part of the site allocation and is subject to a set of slightly different constraints. The policy text notes that development should be well integrated with and complement proposals for 60-72 Upper Ground but it is agreed that these references could be clearer.</p> <p>PROPOSED CHANGE p.57 'Neighbour relationships' section.</p> <p>Add new second paragraph to read: "<u>Development should be well integrated with and complement neighbouring development at 72 Upper Ground; especially in relation to the site interfaces.</u>"</p>	R0082	MEC London Property 3 (General Partner) Limited

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Inadequate consultation. There should have been more joint working and cooperation between the council, landowner and community.	As set out in the Consultation Statement, the council has drawn up the SADPD in line with and exceeding the requirements of the Local Plan Regulations and the Statement of Community Involvement. A common approach has been taken towards engagement across all sites so as to retain parity between different parts of the borough and to be fair to different stakeholders. No change required.	R0083	Carole Milner
Wording about design life of buildings should be amended from "50-60 years for commercial" to "75 years for non-residential" to align with the updated national PPG. A flood risk activity permit (FRAP) will be required from the Environment Agency for activities within 16m of a tidal main river or flood defence structure.	Agreed. PROPOSED CHANGE p.57 'Flood risk mitigation' section. Amend paragraph 9 to read: "All developments adjacent to a tidal flood defence must ensure the current and future statutory crest levels are maintained as outlined in the Thames Estuary 2100 plan and the condition of tidal wall defences provide a sufficient level of defence in accordance with the design life of the building (e.g. generally 100 years for residential and 50-60 years for commercial <u>75 years for non-residential</u>), and that a 16 metres setback <u>is safeguarded for inspections, maintenance, future defence raising and potential replacement without increasing flood risk or encroaching on the river channel. 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.</u> "	R0282	Environment Agency
Construction materials and waste must be transported by river.	Use of the river to transport materials and waste during construction is considered to be a justified aspiration. The site allocation acknowledges that this may not be possible in all cases. No change required.	R0092	Green Group Councillors
Oversupply of offices in the area.	The site allocation sets out appropriate uses for the site. It is not specific about the mix or quantum so as to offer flexibility to develop the site in an appropriate manner. There are targets for both office and residential development in the Waterloo Opportunity Area and both types of development are required in the area. No change required.	R0092	Green Group Councillors
Should reference Old Barge House Alley conservation area and OXO Tower in site allocation. Development	Like other designated heritage assets, Old Barge House Alley CA is already identified in the allocation due to its proximity. The OXO Tower (local heritage list) can be added to the list of nearby assets. The relationship of these assets to the site is explored in Views 3 and 4 in the design evidence. It is anticipated	R0285	London Borough of Southwark

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
should take account of these heritage assets.	<p>that the heritage assets listed in the allocation, and views used in the design evidence will inform an applicant's future heritage impact assessments.</p> <p>SUGGESTED CHANGE p.49 'Heritage assets' section.</p> <p>Add a sixth bullet point to read: "<u>OXO Tower (LB Southwark)</u>"</p>		
Site not appropriate for a tall building. Development should sit with or below the height of the IBM building and London Studios.	The design evidence for this allocation has considered impacts on the Old Barge House Alley CA and on the OXO tower (see views 3 and 4). Any future applicant would be expected to do the same. This allocation is identified as 'not appropriate' for a tall building. The protected strategic view that cuts across the front of the site limits height to that of IBM (which is affected by the same view constraint). At the rear of the site there is no such 'hard' constraint but, whilst there is scope for greater height, the site constraints mean that the site is not appropriate for a tall building. Therefore, the heights will be significantly lower than the London Studios approval. No change required.	R0285	London Borough of Southwark
Site is not appropriate for a tall building. Tall buildings are defined as over 25m directly facing the river.	Disagree. The London Plan does not set specific height limits for tall buildings and says that boroughs should define them in their development plan. Lambeth Local Plan Policy Q26 defines tall buildings as 45m north of the South Circular Road and 25m south of that road. A tall building for this site would therefore be 45m. The site allocation policy states that 'the site is not appropriate for a tall building, defined as above 45m in this location'. No change required.	R0092	Green Group Councillors
Concern at height of development; impact on character and views.	The design evidence for this allocation has considered impacts on views. Any future applicant would be expected to do the same. This allocation is identified as 'not appropriate' for a tall building. At the rear of the site, whilst there is scope for greater height, the site constraints mean that the site is not appropriate for a tall building. No change required.	R0229	Katherine Roberts
Quantum of development proposed is too large and would be harmful to neighbours and views.	The capacity of each site has been tested through modelling and reflects the London Plan requirement of 'design-led optimisation'. The design evidence for this allocation has considered impacts on views. No change required.	R0269	Waterloo Community Development Group

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Question whether the proposed development would be viable.	The indicative proposals shown in the SADPD have been assessed for their financial viability, as set out in the viability assessment, document EB 05. Site 9 shows a significant surplus when residual land value is assessed against benchmark land value. No change required.	R0083	Carole Milner
Insufficient information to assess the impact the proposed site allocations will have on clean water infrastructure, waste water network infrastructure and sewage treatment works. Details are required of the location, type and scale of development together with the anticipated phasing.	The location and indicative land uses are set out in the site allocation policy. The quantum of development is not specified in the policy and developers will need to liaise with Thames Water at the time of an application to enable an appropriate response to be given. Further detail around phasing of site allocations is being updated as part of the annual review of the Housing Trajectory and will be included as a modification for each site allocation.	R0022	Thames Water
Thames Policy Area should be included on maps.	The Thames Policy Area is listed as a relevant policy designation and the plan must be read as a whole. It is considered that inclusion of this designation on the site plan would lead to clutter and visual confusion. No change required.	R0065	Port of London Authority
Enhanced pedestrian connections to Thames Path should be shown.	The vision section already includes improving the public realm at Queen's Walk, providing better activation to the river frontage and helping increase the permeability of the area. New pedestrian routes to the east and west of the site are required by the 'Transport, movement and public realm' section. Together these are considered to provide enhanced connections to the Thames Path. No change required.	R0065	Port of London Authority
Reference to riverbus services should be added. Reference to public access to the riverside should be added. Reference to provision of riparian life-saving equipment should be added.	References to London Plan and Local Plan policies relating to riverbus services and access to the riverside can be added, together with the Local Plan policy relating to life-saving equipment. PROPOSED CHANGE p.56 'Transport, movement and public realm' section. Add text to end of first paragraph to read: " <u>London Plan Policy SI 15 and Local Plan Policy T5 relating to river transport may also be relevant.</u> "	R0065	Port of London Authority

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>PROPOSED CHANGE p.58'Access to open space and nature conservation' section.</p> <p>Add new second paragraph to read: "<u>Development proposals are encouraged to explore opportunities for new, extended, improved and inclusive access to and from nearby waterways in line with the aims of London Plan Policy SI 16 and Local Plan Policy Q24. Riparian life-saving equipment should also be provided where necessary and appropriate, in line with Local Plan Policy Q24</u>"</p>		
Development needs to build on the current successful independent commercial uses.	Policy wording already requires active frontage and cultural uses on the ground floor including a range of small and medium sized units suitable for independent businesses and cultural uses. No change required.	R0269	Waterloo Community Development Group
Relationship to Bernie Spain Gardens and the river are critical.	<p>Policy wording states that development should ensure that the amenity value of Bernie Spain Gardens is not diminished by undue overshadowing or enclosure. This could be extended to also reference Queen's Walk.</p> <p>PROPOSED CHANGE p.57 'Neighbour relationships' section.</p> <p>Amend text as follows: "Development should ensure that the amenity value of Bernie Spain Gardens is <u>and Queen's Walk are</u> not diminished by undue overshadowing or enclosure."</p>	R0269	Waterloo Community Development Group
The existing uses are planned to be the subject of investment to enable them to remain until then. Site allocation should refer to this position and accept meanwhile uses.	<p>Agreed.</p> <p>PROPOSED CHANGE p.54 'Land uses' section.</p> <p>Add new paragraph to read: "<u>Meanwhile uses on Gabriel's Wharf and Princes Wharf will be encouraged in advance of comprehensive redevelopment. Investment to enable this will be supported.</u>"</p>	R0275	Coin Street Community Builders (CSCB)
Tree protection area does not extend into the site by 9m. Footprint on	<p>Trees in Bernie Spain Gardens have been re-measured in October 2024 to assess the adequacy of the proposed 9m root protection area (RPA). This shows an increase since they were last measured in 2018.</p> <p>At current rates of growth, the trees are projected to attain a diameter of 73cm with an RPA of 8.8m by</p>	R0275	Coin Street Community Builders (CSCB)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
eastern side should not be pulled back from Bernie Spain Gardens.	<p>2030.Over the last decade, London plane trees in London have become susceptible to disease. BS 5837:2012 is currently undergoing revision, with the potential for additional tree protection measures being implemented. These measures may include new biosecurity protocols to ensure the protection of London plane tree roots.</p> <p>Given the potential for continued root and crown expansion of the trees, plus the risk from current and new pests and diseases to London Plane trees, the Council deems the proposed 9m root protection zone to be appropriate and evidenced. No change required.</p>		
58 Upper Ground should not be required to be retained.	No 58 Upper Ground is identified in the Southbank Conservation Area Statement (2009) as a positive contributor to the conservation area. It is one of the surviving structures from the time when the Southbank was lined with wharves. The building facade is well detailed, and it has attractive ironwork gates. The starting point for any best-practice, context-led redevelopment of the site should be the retention of positive contributor buildings of this nature. For that reason, the Council has sought its retention. No change required.	R0275	Coin Street Community Builders (CSCB)
Provision of pedestrian route to the west of the site should not fall entirely on the site allocation.	The 'Transport, movement and public realm' section states that the pedestrian route to the west of the site should be delivered in partnership with the owners of 72 Upper Ground, including straightening the current irregularity in the party wall building line on the western side of Princes Wharf. The obligation would not fall entirely on the site allocation and, given the current irregular boundary between the two sites, it is considered that an element of land from both sites will be required to deliver the route. No change required.	R0275	Coin Street Community Builders (CSCB)

Site 17: 330-336 Brixton Road SW9

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
General support for site allocation.	Support noted.	R0008 R0058	Brian Clavaz WeAre336
Support for comprehensive redevelopment.	Support noted.	R0058	WeAre336
There is no convincing overall vision for the combined sites.	Noted. The Council considers the allocation to set an appropriate vision for the site.	R0079	Brixton Society
Objection to comprehensive redevelopment.	Noted. A comprehensive approach to development would help optimise development potential at this site. However, the site allocation recognises that the site's varied land ownership may result in development coming forward in phases. If development comes forward incrementally, the site allocation policy expects each phase to 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. No change required.	R0079	Brixton Society
Combination of sites not justified given different ownerships and uses.	Noted. We consider a comprehensive approach to development is justified, on the basis that this would help optimise the development potential at this site and deliver greater public benefits. The site allocation encourages landowners to cooperate in bringing forward comprehensive development. The site allocation recognises that the site's varied land ownership may result in development coming forward in phases. If development comes forward incrementally, the site allocation policy expects each phase to 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. No change required.	R0079	Brixton Society
Addition of housing detrimental to existing business space on site.	The site allocation policy envisages no net loss of employment floorspace on site. London Plan E7 D requires that the co-location of new residential must not compromise existing industrial and related activities on site. Agent of change principles set out under London Plan Policy D13 will also apply.	R0079	Brixton Society
Site needs a comprehensive masterplan.	Noted. The Council considers the allocation to set an appropriate vision for the site. Given the modest scale of the site a masterplan is not considered necessary in this instance.	R0293	Aquila Properties Ltd

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Object to the Council's high rise / high density model.	The site allocation does not recommend a 'high rise' approach, and the site is not identified as suitable for a tall building. The approach to developing site allocation policies is based on the design-led optimisation of development capacity, as required by London Plan Policy D3. Further evidence on the approach taken for this site can be found in the Design Evidence which supports the SADPD.	R0079	Brixton Society
The SADPD does not take into account issues which have emerged since the Local Plan 2021 was published, such as increases in building material costs, inflation, and other policy requirements affecting viability.	The site allocations within the SADPD have undergone viability testing. This was undertaken by an experienced third-party consultant. The proposed land uses and quantum for this site were found to be viable.	R0079	Brixton Society
Support retaining the façade of 'We are 336'	Support noted.	R0058	WeAre336
Vehicle access for servicing or access to disabled persons' parking spaces should be from Winan's Walk.	Disagree. Disabled parking should be accessible and easy to use, with designated accessible spaces as close as possible to the main entrance to the facilities. The Department for Transport's guidance on Inclusive Mobility suggests these should be no more than 50m away from the entrance. Providing parking to the rear of the site along Winan's Walk would require users to enter via a separate access at the rear of the site, with any internal route to the building's primary entrance and lobby would likely be far greater than 50m. No change required.	R0014	Transport for London
Uses linked to last mile distribution/logistics or 'just-in-time' servicing should utilise cargo bikes and minimise the need for vehicle access.	PROPOSED CHANGE p.70 'Transport, movement and public realm' section. Amend the third paragraph to read: "Servicing should be accommodated off-street, potentially using Winans Walk as per the existing arrangement. This must allow servicing vehicles to enter and exit in forward gear. <u>Where land use is linked to last mile distribution/logistics or 'just-in-time', servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u> "	R0014	Transport for London

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Disabled persons' parking on the Brixton Road may prejudice public realm improvements.	It is considered that there is both scope for the provision of disabled parking and improvements to the public realm along the Brixton Road frontage.	R0014	Transport for London
Supportive of additional text on planning obligations to fund public realm improvements.	Support noted.	R0014	Transport for London
Support improved footway along Winans Walk subject to maintaining servicing.	Support noted.	R0058	WeAre336
Object to grass area along frontage along Brixton Road, this area must retain disabled parking.	The site allocation does not require grass along Brixton Road. The section 'Urban Greening and trees' states that "Soft landscaping should be incorporated on the Brixton Road frontage that will enhance the visual attractiveness of the site and provide a SuDS function". It is considered that there is both scope for the provision of disabled parking and improved greening along the Brixton Road frontage. No change required.	R0058	WeAre336
Supportive of east-west pedestrian route across the site to link.	The site allocation policy does not promote a new east-west pedestrian route. This is not considered necessary given the existing levels of permeability, as clarified at para 4.2 of the Design Evidence paper for site 17.	R0058	WeAre336
Biodiversity Net Gain and Urban Greening are incompatible with the high density / high rise development.	London Plan Policy requirements relating to Urban Greening Factor and Biodiversity (London Plan G5 and G6) seek to protect, enhance, create and/or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy. Local Plan Policy EN1 D requires major development in areas of open space deficiency and/ or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. London Plan Urban Greening Factor (PolicyG5) requirements will apply. London Plan Urban Greening Factor (Policy G5) requirements will apply. In addition, the new Biodiversity Net Gain requirements in the Environment Act 2021 will apply to any future planning application at this site. This will require new development to achieve a 10% net gain in biodiversity.	R0079	Brixton Society

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Supports the identification of the petrol station as potential source of contamination.	Support noted.	R0282	Environment Agency
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 location, indicative land uses and development quanta are set out in the site allocation policy. Further detail around phasing of site allocations is being updated as part of the annual review of the Housing Trajectory and will be included as a modification for each site allocation.	R0022	Thames Water

Site 18: 300-346 Norwood Road SE27

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
General support for redevelopment of the site.	Support noted.	R0030 R0030a R0075 R0078 R0256 R0261 R0268	Jackie Meldrum Jackie Meldrum James Tate Station to Station BID Helen Hayes MP Dee Byrne Norwood Action Group (NAG)
Site 18 should be removed from the SADPD so it can be treated as a separate exercise.	It is considered appropriate to include this site in the SADPD. The allocation will bring significant opportunity for sustainable mixed-use redevelopment. Having an allocation can address site-specific circumstances that may require a more tailored approach, giving more certainty to what can be achieved.	R0067 R0115 R0123b R0261	Norwood Forum Jane Pickard Penelope Alford Dee Byrne
Opposing the proposal for Site 18 generally.	Noted.	R0288 R0295	Irene Hird Tom Palmer
Support for redevelopment of derelict sites including B&Q site and petrol station.	Support noted.	R0064	Elizabeth Rowland
Investment required to improve the quality of life and make the area and its local economy grow.	Noted. The purpose of the site allocation is to unlock development which will bring benefits to existing and new communities.	R0044	Elisa Orlandi
Future development should meet requirements set in London Plan Policy E7.	Development proposals on any of the parcels within the site that come forward will be assessed against the relevant policies of the London Plan, Lambeth Local Plan any adopted Neighbourhood Plan and, when adopted, the SADPD. As per all other relevant local Development Plan policies, proposals are expected to meet the requirements of London Plan policy E7.	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Opposing the loss of the relatively new building at 348-352 Norwood Road.	This building sits outside the revised red line boundary.	R0114	Francis Howcutt
Blocks at York Hill Estate are not 5-storey blocks but mainly 3-storey blocks.	This is not correct. Most blocks within York Hill Estate are ground plus four storeys, particularly those facing Site 18.	R0030 R0030a	Jackie Meldrum Jackie Meldrum
On-site petrol station should be identified as a potential contaminative use of the site within the 'site context' section.	Agreed. PROPOSED CHANGE p.110 'Groundwater and contaminated land' section Add statement: ' <u>Potential contamination from petrol station.</u> '	R0282	Environment Agency
Acknowledgement of the nearby groundwater borehole and the Source Protection Zone 2 designation welcomed.	Noted.	R0282	Environment Agency
Lack of thorough and well publicised public consultation.	Consultation of the SADPD was carried out in line the Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of Lambeth's Statement of Community Involvement. In accordance with Regulation 18(1)(a), general and specific consultation bodies, residents and other persons carrying out business in the borough that may be affected by the proposals in the SADPD were invited to make representations. An engagement plan was put together at the outset of the project with the aim of broadening participation in line with Lambeth's SCI. As part of this plan, a stakeholder mapping exercise was carried out which identified three categories of stakeholders according to their level of engagement; 'active', 'aware and potentially active' and 'groups with whom the Council had struggled to engage in the past'. In order to reach all of these groups, the engagement plan comprised a range of specifically designed engagement and publicity methods, including engagement with elected politicians, online area-based meetings with representatives from community groups and organisations based in the neighbourhoods in which the Council proposed a site allocation, dedicated virtual presentations to other organisations operating in the borough, and workshops with young people. Publicity and dissemination	R0018b R0025 R0044 R0051 R0066 R0067 R0069 R0070 R0071 R0073 R0074 R0077 R0078	Blandine Scalbert Jonathan Fowles Elisa Orlandi Jenny Ochera Lucy Waitt Norwood Forum Maggie Bacon Vicky Rapti Claudia Senese Karen John-Pierre Manda Glanfield John Mason Station to Station BID

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>methods used at Regulation 18 consultation stage comprised notification emails, social media posts on several platforms, and online articles and entries in digital newsletters and e-bulletins.</p> <p>Similarly, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council notified all those general consultation bodies and specific consultation bodies invited to make representations under Regulation 18 of the SADPD PSV being made available for inspection and invited them to make representations under Regulation 19/20. This notification was also intended to those who had submitted representations as part of the Regulation 18 consultation. Engagement methods used during this round of consultation included several meetings with ward councillors and Members of Parliament and online area briefings with representatives from community groups and organisations. Beyond the email notification the Council sought to broaden the range of stakeholders involved by using other publicity and dissemination methods such as social media posts and online articles, which were published on Lambeth-wide e-bulletins.</p> <p>Further detail on the consultation process, the stakeholder mapping and engagement methods used for the two stages of the consultation on the SADPD are included in the Regulation 22 Consultation Statement, available as part of the Examination library (Ref. SD 10).</p>	R0089 R0113 R0114 R0115 R0121 R0136 R0143 R0147 R0150 R0152 R0154 R0157 R0186 R0190 R0258 R0261 R0263 R0268 R0270 R0123b R0292 R0296 R0297 R0298 R0303	Alison Gibbs Sue Williams Francis Howcutt Jane Pickard Jonathan Potts & Jane Hummerston Andrew Gilbert Timothy Fairhurst Jane Pickard Philip Gill Victoria Freestone Nicola Cox Raymond Trevitt Diane Eagles Paul Brewer Claire Felstead Dee Byrne Helen George Norwood Action Group (NAG) Odilon Couzin Penelope Alford Chris Agathangelou Susan Osborn James Forrester Josephine Botting Jane Pickard

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0306 R0308	James Chandler James Chandler
Conflict between consultation period and pre-election period for elections to the Mayor of London.	The Regulation 19 representations procedure is a technical procedure allowing the submission of representations on the legal compliance and soundness of development plan documents. The representations received, rather than informing a decision to be taken by the Council, are submitted along the proposed submission version development plan document (the SADPD PSV in this case) and supporting evidence to government for examination. The Regulation 19 representations procedure for the purposes of plan-making was considered to be “business as usual” and was therefore considered appropriate to take place during the pre-election period for the Mayoral elections. This approach was agreed by the council’s legal team. Please note the pre-election period did not limit the Greater London Authority’s capacity to submit representations pursuant to Regulation 20 during the pre-election period since this is a statutory responsibility of the Mayor of London.	R0067 R0070 R0080 R0258 R0261	Norwood Forum Vicky Rapti Norwood Society Claire Felstead Dee Byrne
Lambeth Council has failed to adhere to their commitment to carry out further public engagement and hold feedback sessions to speak to residents took on at the Cabinet meeting held on 15 January 2024.	Commitment to carry out further public engagement was reaffirmed by Cllr Danial Adilypour, ward Councillor for Streatham Common and Vale (Labour and Co-operative) and Deputy Leader for the Council (Housing, Investment and New Homes) during the Cabinet meeting held on 15 January 2024. This engagement took the shape of an online area briefing held on 9 April 2024 and was attended by representatives from community groups and organisations based in West Norwood such as the Norwood Planning Assembly, the Norwood Forum, the Station to Station Business Improvement District (BID) and the Norwood Society. As set out in Lambeth’s Statement of Community Involvement, further opportunities for community involvement will be available when any future planning application is submitted. These include opportunities for community involvement led by developers or applicants, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations on any aspect of the proposal.	R0258 R0261	Claire Felstead Dee Byrne
Lack of consent of those who will be most affected by it.	The SADPD has been subject to consultation throughout its preparation at both Regulation 18 consultation and Regulation 19 representations procedure stages. Please refer to the Regulation 22 Consultation	R0078	Station to Station BID

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Statement (made available in the Examination library with ref. SD 10) for details on how the consultation on the SADPD was carried out and the Council's response to representations received throughout the process. There will be further opportunities to comment on any development proposal as part of a planning application.		
Not notified despite of having participated in the Reg 18 consultation.	This issue was rectified by notifying those that had not been notified and re-opening the Regulation 19 representations procedure for a further period of eight weeks between 18 June and 13 August 2024. Please refer to the Regulation 22 Consultation Statement (made available in the Examination library with ref. SD 10) for further detail on the issues that prevented the original notification email reaching all those that had submitted representations as part of the Regulation 18 consultation.	R0018b	Blandine Scalbert
Suggestion to put in place specific arrangements for local community engagement as detailed proposals for the site are brought forward, so that the views and aspirations of the local community can inform the proposals from the outset.	Arrangements for local community engagement as detailed proposals for the site are brought forward are included in Lambeth's Statement of Community Involvement which sets out how and when the community and other stakeholders can be involved in the planning process. The same arrangements apply to all proposals in the borough that come through the planning application system, independently of the nature of the development or the type of developer. These arrangements include opportunities for community involvement led by developers or applicants, who are encouraged to engage with the community and stakeholders before submitting any application. The planning application process also allows for members of the community and community groups to submit representations during the planning consultation period.	R0256	Helen Hayes MP
Information provided to Cabinet members considered incomplete and/or inaccurate.	The SADPD was brought to Cabinet on 15 January 2024 where the Proposed Submission Version of the document (SADPD PSV) and the Proposed Changes to the Policies Map were agreed for publication and submission to government for independent examination. At this meeting, Cabinet members were presented with a Cabinet Report that summarised the preparation process for the SADPD PSV with a focus on next steps. The Public Consultation section of the report summarises the consultation process under Regulation 18, the ways in which the consultation of the Draft SADPD was publicised, the different media available for stakeholders to submit representations, a summary of the responses received generally and per site, and a summary of the main changes arising from the Regulation 18 consultation.	R0067 R0085	Norwood Forum Susan Osborn

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Appendix 3 to the Cabinet Report draws particular attention towards the main concerns raised for Site 18 and Site 19 at the Regulation 18 consultation. This responds to the fact that Sites 18 and 19 received the highest proportion of representations (39.8% of all representations received for Site 18, 44.4% for Site 19). The same Appendix 3 goes on to detail the key changes to the SADPD PSV for each of the sites, including Site 18.		
Response to representations made during the Regulation 18 consultation considered to inadequately address important issues raised.	<p>All representations received in response to Regulation 18 consultation were considered by officers. A full analysis of the comments received and the officers' response to them are included in the Regulation 18 Consultation Report (published as part of the Examination Library with the reference SUP 13). The content of the SADPD was subsequently reviewed to take account of the comments received. As a result, the following key changes were made to the Site 18 allocation in the SADPD Proposed Submission Version (PSV):</p> <ul style="list-style-type: none"> - Site boundary amended to reduce scale of allocation and exclude existing housing at northeast corner and southwest corner, as well as the 'laundry' site, which is already under construction - Reduction in the number of residential units proposed, which has decreased from 390-470 units to 150-170 units - Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000-4,000 sqm. This commercial/community floorspace will include at least 1,123 sqm of light industrial workspace in order to achieve no net loss of existing industrial floorspace capacity. - Policy re-worded to make clear that inclusion within the site allocation boundary does not compel land to come forward for development - Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g., public benefits are achieved - Inclusion of wording to make clear that the community use on the site should be re-provided, in line with Local Plan Policy S1 	R0270 R0067	Odilon Couzin Norwood Forum
Residents were not adequately notified of the important key decision.	Democratic Services are responsible for publishing key decisions on the Forward Plan. When a key decision (such as the publication of the SADPD PSV) is entered on the Forward Plan, all 63 Councillors, Cabinet officers, the Head of the Leader's office, and group support officers are notified via email with a	R0067	Norwood Forum

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
to be made at Cabinet meeting about their town centre.	link to the decision in advance of the Cabinet Members meeting in which the decision is to be made. Another notification email is sent out to the same recipients when the decision is made. It is unreasonable to expect Officers to notify all consultees when every decision is taken. In this instance Officers rely on ward councillors to keep their constituents up to date on specific matters that are of local importance.		
Stakeholders and community groups were not informed about the Regulation 18 consultation period in a timely manner.	<p>The Draft SADPD was published for publication pursuant to Regulation 18 for a period of six weeks from Monday 10 January to Monday 22 February 2022. Although the length of the consultation period is not prescribed as part of the Town and Country Planning (Local Planning) Regulations 2012, Lambeth's Statement of Community Involvement states that the minimum length of any consultation period pursuant to Regulation 18 should be six weeks.</p> <p>Engagement methods designed to widening participation in the consultation included engagement with elected politicians, online area-based meetings with representatives from community groups and organisations based in the neighbourhoods in which the Council proposed a site allocation, dedicated virtual presentations to other organisations operating in the borough, and workshops with young people. Publicity and dissemination methods included notification emails, social media posts on several platforms, and online articles and entries in digital newsletters and e-bulletins.</p> <p>Please refer to the Regulation 22 Consultation Statement (made available in the Examination library with ref. SD 10) for details on how the consultation on the SADPD was carried out.</p>	R0067	Norwood Forum
Scale and massing out of place in a suburban context.	The purpose of the planning process is to manage change. The Council acknowledges that the character of this part of the town centre will change because of the site allocation. However, the Council's evidence, which includes detailed townscape analysis, has concluded that the site optimisation can be delivered without harmful townscape impacts.	R0018b R0025 R0030 R0030a R0066 R0067 R0068 R0071 R0072 R0080	Blandine Scalbert Jonathan Fowles Jackie Meldrum Jackie Meldrum Lucy Waitt Norwood Forum Sarah Bailey Claudia Senese Julia Finlay Norwood Society

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0085	Susan Osborn
		R0089	Alison Gibbs
		R0113	Sue Williams
		R0115	Jane Pickard
		R0121	Jonathan Potts & Jane Hummerston
		R0131	Anthony Cowan
		R0143	Timothy Fairhurst
		R0147	Jane Pickard
		R0154	Nicola Cox
		R0186	Diane Eagles
		R0190	Paul Brewer
		R0217b	Edmund Neuberger
		R0258	Claire Felstead
		R0261	Dee Byrne
		R0263	Helen George
		R0123b	Penelope Alford
		R0292	Chris Agathangelou
		R0295	Tom Palmer
		R0296	Susan Osborn
		R0297	James Forrester
		R0298	Josephine Botting
		R0303	Jane Pickard
		R0306	James Chandler
		R0308	James Chandler

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Opposing the loss of historic buildings within the site boundary.	<p>Noted. It is not disputed that the two shopping parades are Victorian or that they appear in historic photographs. However, the terraces in question are of a very ordinary type; they are extremely common across London and further afield.</p> <p>Nos 336 – 346 – Terrace of six stock brick properties. Three storeys. Mid-19th Century. London roofs, stucco details to façade. No historic shopfronts, four properties have replacement windows. Front parapets have been rebuilt (post-war). Flat rear elevations with single storey retail extensions. Ghost sign on north flank.</p> <p>Nos 324 – 334 – Terrace of six, two-storey properties in stock brick with pitched roofs and stucco details. Some dormers. Later, single storey shop projections. No historic shopfronts, many replacement windows. Missing and truncated chimneys.</p> <p>They are not of sufficient interest to warrant treatment as non-designated heritage assets. Retention is not justified.</p> <p>Historic England has been consulted on the proposals put forward as part of this allocation. A Statement of Common Ground between the London Borough of Lambeth and Historic England can be found along this Consultation Statement in the Examination library (Ref. SCG 09).</p>	R0025 R0026 R0069 R0073 R0080 R0085 R0089 R0114 R0143 R0150 R0152 R0157 R0190 R0197 R0256 R0258 R0261 R0123b R0277 R0292 R0296 R0301	Jonathan Fowles Christine Hinton Maggie Bacon Karen John-Pierre Norwood Society Susan Osborn Alison Gibbs Francis Howcutt Timothy Fairhurst Philip Gill Victoria Freestone Raymond Trevitt Paul Brewer Susan Wright Helen Hayes MP Claire Felstead Dee Byrne Penelope Alford Mark Fairhurst Chris Agathangelou Susan Osborn Norwood Action Group
Negative impact on the setting of heritage assets in the area.	The Council's detailed townscape and heritage impact assessment appended to the Design Evidence has concluded assessment of the effect on the setting of St Luke's Church (views 1, 2, 3, 4, 5) and on the setting of the West Norwood Conservation Area (views 5, 6, 7, 8, 9 and 10) is not adverse.	R0018b R0025 R0067 R0070	Blandine Scalbert Jonathan Fowles Norwood Forum Vicky Rapti

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>The locally protected view of St Luke's Church south along Norwood Road appears in the draft Local Views Supplementary Planning Document (2020), which states that:</p> <p><i>'3.26 Whilst the landmark tower (and the symmetrical façade supporting it) is the important focal point of the view the enclosure formed by foreground buildings on Norwood Road are essential compositional elements – providing framing and depth.'</i></p> <p><i>3.27 New development should not harm the overall composition of the view through the trees nor compete with it as a silhouette against clear sky.'</i></p> <p>St Luke's church has been designed to formally terminate the vista along Norwood Road. Its visibility at the end of the view, the symmetrical composition, and its elevated position are key to its significance. Officers consider that it is the enclosure that is important in the foreground, not the buildings that create that enclosure, which are not considered to contribute to the significance of the church. The key consideration is that any subsequent development maintains the strong sense of enclosure within the foreground of the view – framing the church in townscape. The site allocation's potential replacement of foreground buildings will not harm the overall composition of the view – ensuring that the view of the church is still adequately framed by townscape on either side of Norwood Road.</p> <p>The views out of the Conservation Area towards the site allocation have been considered in the views analysis appended to the site allocation's Design Evidence. Views 5, 6, 7, 8, 9, 10 and 11 are all from within the conservation area looking north towards the site allocation. The assessment has concluded that no harm results in these views.</p> <p>View 2 is the locally designated view from Norwood Road looking into the conservation area. It has been discussed in detail above. St Luke's Church is the principal feature of the conservation area visible in that view. As the above assessment above has concluded, no harm would result to the setting of the</p>	<p>R0073</p> <p>R0077</p> <p>R0121</p> <p>R0131</p> <p>R0142</p> <p>R0143</p> <p>R0150</p> <p>R0152</p> <p>R0157</p> <p>R0190</p> <p>R0258</p> <p>R0261</p> <p>R0277</p>	<p>Karen John-Pierre</p> <p>John Mason</p> <p>Jonathan Potts & Jane Hummerston</p> <p>Anthony Cowan</p> <p>John Mason</p> <p>Timothy Fairhurst</p> <p>Philip Gill</p> <p>Victoria Freestone</p> <p>Raymond Trevitt</p> <p>Paul Brewer</p> <p>Claire Felstead</p> <p>Dee Byrne</p> <p>Mark Fairhurst</p>

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>church. Given the role of the church in the conservation area in this view, it is considered that the same applies to the conservation area setting in this view. No harm.</p> <p>Historic England has been consulted on the proposals put forward as part of this allocation. A Statement of Common Ground between the London Borough of Lambeth and Historic England can be found along this Consultation Statement in the Examination library (Ref. SCG 09).</p>		
Concerns regarding the quality of the VU-city model used to assess the impact of the proposed allocation on local views.	The VU-city state that their model is accurate to within 15cm. Whilst some of the building massing in the base model is unrefined, it is perfectly adequate for the townscape and heritage setting assessment purposes.	R0277	Mark Fairhurst
Concerns regarding the quality of the assessment of local views in the design evidence accompanying the SADPD.	<ul style="list-style-type: none"> - Relationship between the landmark tower of St. Luke's Church in the middle ground and the distant City's tall building cluster in wider panorama view (Image 4 in the design evidence documents DE 18 and 18a). <p>The indicative approach is way off to the left in this view. It does not diminish the viewer's ability to appreciate St Luke's Church tower or the city cluster. The visibility of the tallest element of the site allocation in this elevated view is not considered problematic in wider townscape terms. This is a main road approach towards the town centre. It is not unusual to see the largest buildings of a locality within the town centre. The indicative approach is only visible in this instance because of the elevated topography of the viewing location. Even then, given the kinetic experience of the viewer (travelling downhill) the experience will be fleeting at best and partially obscured by trees and intervening buildings as the viewer progresses downhill.</p> <ul style="list-style-type: none"> - View analysis of images 2-16. <p>The Council considered its analysis to be sufficient for the purposes of the site allocation and its findings justified.</p>	R0277	Mark Fairhurst

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Some of the recommended design criteria for the site are a step backwards in the aspirations for the future development from the current Local Plan Policy PN7.	The site allocation in the Lambeth Local Plan (2021) was carried forward, unaltered from the 2015 Local Plan. When prepared that allocation did not benefit from the detailed scrutiny given to the current draft allocation.	R0277	Mark Fairhurst
Scale and massing likely to negatively impact the amenity of neighbouring properties.	The indicative approach, which has informed the allocation quantum, has been prepared taking into account separation distances and daylight and sunlight. Any subsequent applications that come forward would be assessed against the relevant amenity policies in the Development Plan, particularly Local Plan policy Q2.	R0025 R0067 R0070 R0072 R0073 R0077 R0085 R0131 R0143 R0150 R0152 R0154 R0157 R0190 R0258 R0261	Jonathan Fowles Norwood Forum Vicky Rapti Julia Finlay Karen John-Pierre John Mason Susan Osborn Anthony Cowan Timothy Fairhurst Philip Gill Victoria Freestone Nicola Cox Raymond Trevitt Paul Brewer Claire Felstead Dee Byrne
Scale and massing likely to negatively impact the public realm, e.g., by overshadowing and creating a canyon effect.	The Council considers that these detailed matters can be addressed by applicants at design development stage. Shade, and the resultant cooling of temperatures at ground level, is becoming increasingly important given climate change and rising urban temperatures.	R0051 R0067 R0074 R0085 R0142 R0190	Jenny Ochera Norwood Forum Manda Glanfield Susan Osborn John Mason Paul Brewer

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0297 R0298 R0306 R0308	James Forrester Josephine Botting James Chandler James Chandler
Lack of evidence demonstrating that a widened pavement will increase the footfall or commercial success of the town centre.	Noted. The Council considers that wider footways in this town centre would benefit the whole community. This is particularly evident at busy times such as the 'West Norwood Feast' event which is a long-established monthly street market that attracts throngs of people and contributes to an overall strong sense of vitality of the centre.	R0115 R0147	Jane Pickard Jane Pickard
The design of the proposed development perceived as poor.	It must be remembered that the Indicative Approach is not a proposal. It has been prepared solely to inform an understanding of site capacity and what could come forward. Any development coming forward will be assessed against the design policies of the London Plan and Local Plan. It is therefore premature to conclude a development will negate policies in Section 10 of the Local Plan 2021 'Quality of the Built Environment' or be unsympathetic with the visual amenity of the area.	R0026 R0277 R0292	Christine Hinton Mark Fairhurst Chris Agathangelou
Insufficient detail regarding the design of the buildings has been provided.	It must be remembered that the Indicative Approach is not a proposal. It has been prepared solely to inform an understanding of site capacity and what could come forward. Any development coming forward will be assessed against the design policies of the London Plan and Local Plan.	R0306 R0308	James Chandler James Chandler
Suggestion for a public square to be provided across the road by closing Chatsworth Way at its junction with Norwood Road to traffic as part of the Council's Low Traffic Neighbourhood plans for West Dulwich.	That location stands across Norwood Road from the site allocation. Whilst there may be merit in the creation of a public space here, it would be separate from the allocation development and would require road closures etc. The Council considers a location within the site allocation to be the preferable location for a public space.	R0301	Norwood Action Group
Possible to provide the same number of residential units whilst retaining the Victorian frontage buildings and	Noted. Without detailed evidence to support this assertion the Council cannot comment.	R0301	Norwood Action Group

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
avoiding development in excess of 6 storeys.			
Design led optimisation perceived as encouraging urban development out of character with the existing townscape.	The purpose of the planning process is to manage change. The Council acknowledges that the character of this part of the town centre will change because of the site allocation. However, the Council's evidence, which includes detailed townscape analysis, has concluded that site optimisation can be delivered without harmful townscape impacts.	R0277	Mark Fairhurst
The widening of the pavement is considered insufficient.	Noted.	R0292	Chris Agathangelou
The widening of the pavement, if it means the loss of heritage buildings, is not a priority.	Noted.	R0301	Norwood Action Group
Proposed public square considered too small to have any real purpose.	Public spaces come in many shapes and sizes. Irrespective of its size, any public space that comes forward has the potential to enhance the public realm experience of West Norwood town centre. For example, it could be utilised for the Norwood Feast.	R0292	Chris Agathangelou
The allocation of green space is considered insufficient.	Noted. There is no policy requirement to provide green space. There are substantial green spaces within walking distance – at Devane Way and at West Norwood Cemetery.	R0295	Tom Palmer
Impact on local businesses in the wider area and failure to protect them.	Some level of disruption is expected for the duration of the works. In order to minimise impact on existing businesses in the wider area, the council will work with any potential applicants that submit proposals for Site 18 or any part of Site 18 as part of the planning application process. Lambeth Local Plan policy T7 will be of application for any major development within the site as well as any other development where construction related activities may lead to a significant impact on the surrounding public highways. Planning applications for this type of development within Site 18 are required to include a construction logistics plan or a construction management plan appropriate to the scale of the development that demonstrates arrangements for construction traffic and how environmental, traffic and amenity impacts will be minimised. Other parts of this policy will also be applicable.	R0025 R0030a R0051 R0069 R0070 R0072 R0073 R0077 R0078 R0085 R0089	Jonathan Fowles Jackie Meldrum Jenny Ochera Maggie Bacon Vicky Rapti Julia Finlay Karen John-Pierre John Mason Station to Station BID Susan Osborn Alison Gibbs

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0114	Francis Howcutt
		R0115	Jane Pickard
		R0121	Jonathan Potts & Jane Hummerston
		R0142	John Mason
		R0143	Timothy Fairhurst
		R0147	Jane Pickard
		R0150	Philip Gill
		R0152	Victoria Freestone
		R0154	Nicola Cox
		R0157	Raymond Trevitt
		R0186	Diane Eagles
		R0190	Paul Brewer
		R0263	Helen George
		R0123b	Penelope Alford
		R0292	Chris Agathangelou
		R0296	Susan Osborn
		R0298	Josephine Botting
		R0301	Norwood Action Group
		R0309	Tracey Cheltenham
Impact on small independent businesses within the site boundary and failure to protect them.	As a result of the boundary for Site 18 being amended partly in response to the representations made during the Regulation 18 consultation, only retail and commercial premisses located between 300 and 346 Norwood Road are proposed within the allocation. This includes one large retail unit, a total of seven smaller retail units and five small units in use as restaurants or fast-food takeaway outlets. The SADPD proposes a total 3,000 to 4,000 sqm (GIA) of commercial/community floorspace of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace. This will allow for a variety of	R0030 R0030a R0066 R0067 R0074 R0085	Jackie Meldrum Jackie Meldrum Lucy Waitt Norwood Forum Manda Glanfield Susan Osborn

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>commercial unit sizes, including the provision of large-scale commercial units such as the existing B&Q. The policy also requires at least 50 per cent of units along the Norwood Road frontage to be retail use. It is envisaged other town centre and community uses will help diversify and activate the high street.</p> <p>Local Plan policy PN7 B confirms shopping uses in West Norwood/Tulse Hill district centre will be safeguarded and encouraged in an effort to promote the district centre as a hub for community life and retail, commercial and cultural activity. This policy also commits to ensuring any development within the centre enhances its viability and vitality. Any plans for the relocation of existing businesses on site will depend on the nature and timing of development proposals coming forward for the site. The council will encourage applicants to work with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.</p>	<p>R0089</p> <p>R0114</p> <p>R0142</p> <p>R0143</p> <p>R0147</p> <p>R0150</p> <p>R0152</p> <p>R0154</p> <p>R0157</p> <p>R0186</p> <p>R0190</p> <p>R0197</p> <p>R0258</p> <p>R0261</p> <p>R0123b</p> <p>R0277</p> <p>R0292</p> <p>R0297</p> <p>R0298</p> <p>R0309</p> <p>R0310</p>	<p>Alison Gibbs</p> <p>Francis Howcutt</p> <p>John Mason</p> <p>Timothy Fairhurst</p> <p>Jane Pickard</p> <p>Philip Gill</p> <p>Victoria Freestone</p> <p>Nicola Cox</p> <p>Raymond Trevitt</p> <p>Diane Eagles</p> <p>Paul Brewer</p> <p>Susan Wright</p> <p>Claire Felstead</p> <p>Dee Byrne</p> <p>Penelope Alford</p> <p>Mark Fairhurst</p> <p>Chris Agathangelou</p> <p>James Forrester</p> <p>Josephine Botting</p> <p>Tracey Cheltenham</p> <p>Emma Angus</p>
Opposing the loss of B&Q (shop), which acts as a magnet destination.	<p>The SADPD PSV proposes 3,000 to 4,000 sqm (GIA) of commercial/community floorspace of which at least 1,123 sqm GIA are to be re-provided as light industrial workspace. This will allow for a variety of commercial unit sizes, including the provision of large-scale commercial units such as the existing B&Q. Plans for the relocation of existing businesses on site will depend on the nature and timing of any development proposals that come forward.</p>	<p>R0030</p> <p>R0030a</p> <p>R0067</p> <p>R0078</p> <p>R0085</p> <p>R0089</p>	<p>Jackie Meldrum</p> <p>Jackie Meldrum</p> <p>Norwood Forum</p> <p>Station to Station BID</p> <p>Susan Osborn</p> <p>Alison Gibbs</p>

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0292	Chris Agathangelou
Suggestion for the redevelopment of the B&Q site to be delayed until the lease falls due or B&Q decide to move out.	In all cases, the council will encourage applicants submitting proposals for Site 18 or any parcels within Site 18 to work with relevant business improvement districts (BIDs) to help facilitate local and borough-wide opportunities for any business likely to be directly affected.	R0301	Norwood Action Group
Support of the protection of light industrial workspace.	Support noted.	R0078	Station to Station BID
Support for increased shopfront space.	Support noted.	R0292	Chris Agathangelou
Development of the site not being financially viable puts the quota of affordable housing at risk.	The SADPD sets the framework for developments to bring schemes forward. Developers will be required to manage risks involved in bringing these schemes forward. It is assumed that viability will improve over the development plan period for the SADPD which is that for Lambeth Local Plan, i.e., 2020 to 2035. The London Plan, rather than setting a quota, sets a target for affordable housing to be delivered in any major residential development. The Viability Tested Route requires developers to provide the maximum viable quantum of affordable housing within a site. Developers, by choosing to follow the threshold approach (also known as Fast Track Route), commit to provide a minimum of between 35% and 50% affordable housing on site. This approach streamlines the development process for the site by preventing developers from having to prepare viability studies showing that the quantum of affordable housing proposed has been maximised. The London Plan considers both routes equally satisfactory in the delivery of affordable housing.	R0067 R0078 R0085 R0115 R0147 R0268 R0296	Norwood Forum Station to Station BID Susan Osborn Jane Pickard Jane Pickard Norwood Action Group (NAG) Susan Osborn
Development of the site not being financially viable could translate into potential developers pushing for national, London or local policy requirements not being met, including the SADPD itself.	Viability itself does not provide sufficient justification for a development proposal to go against Development Plan policies.	R0078 R0085 R0268	Station to Station BID Susan Osborn Norwood Action Group (NAG)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Development of the site not being financially viable may translate into uncertainty and delay the site coming forward.	Noted. The SADPD sets the framework for developments to bring schemes forward. Developers will be required to manage risks involved in bringing these schemes forward. It is assumed that viability will improve over the development plan period for the SADPD which is that for Lambeth Local Plan, i.e., 2020 to 2035.	R0078 R0301	Station to Station BID Norwood Action Group
Proposal considered not effective since, given the site presents multiple owners, it is questionable whether the proposals as set out are deliverable within the timeframe of the plan.	It is not expected the site will be developed at once. Instead, the most likely scenario is that where separate planning applications affecting specific parcels within the site are submitted independently by different applicants at different times. The site allocation is clear in that it does not require all parts of the site to be redeveloped in one phase.	R0080 R0092 R0268 R0293 R0301	Norwood Society Green Group Councillors Norwood Action Group (NAG) Aquila Properties Ltd Norwood Action Group
Support for housing being proposed as part of the allocation.	Support noted.	R0064 R0078 R0256 R0295 R0301	Elizabeth Rowland Station to Station BID Helen Hayes MP Tom Palmer Norwood Action Group
Support for the redrawing of the red line boundary of the site to the extent it removes existing housing from the site allocation.	Support noted.	R0256	Helen Hayes MP
Opposing the loss of existing housing.	After Regulation 18 consultation, the boundary for Site 18 was modified to exclude the following properties: - Thanet House, - Snowe House, - 294-298 Norwood Road, also known as Knowles of Norwood,	R0114	Francis Howcutt

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<ul style="list-style-type: none"> - 348-362 Norwood Road, - 2-4 Lansdowne Hill, - 6 Lansdowne Hill, also known as the Laundry site, now under construction pursuant planning consent 19/02840/FUL, and - 8-20 Lansdowne Hill. <p>As a result, a total of nine existing residential units located above shops between 328–346 Norwood Road will be affected. It is estimated that the redevelopment of Site 18 will result in between 150 and 170 new homes.</p>		
Opposing some of the units being catered for the Build-to-Rent market.	Noted. Any future proposals for Site 18 or parcels within Site 18 that may come forward through the planning application process should meet the requirements set in London Plan policy H11 and Lambeth Local Plan policy H12.	R0263	Helen George
Support for more affordable housing in the area.	Support noted.	R0256 R0261 R0292 R0296 R0301	Helen Hayes MP Dee Byrne Chris Agathangelou Susan Osborn Norwood Action Group
Preference for affordable units within the site being Social Rent tenure.	The eventual number and tenure of affordable housing units on Site 18 or any parcel within Site 18 will be the result of applying London Plan policies H4, H5 and H6 and Lambeth Local Plan policies H2 and H4. In all cases, of the total number of affordable residential units proposed, 70 per cent would be low-cost units (including Social Rent, also known as “council”, and London Affordable Rent products) while the remaining 30 per cent would be intermediate units (including London Shared Ownership and London Living Rent products).	R0030 R0030a	Jackie Meldrum Jackie Meldrum
Opposing more affordable housing in the area.	Noted. The housing crisis is extremely acute in Lambeth and the demand for housing continues to increase. A mix of housing types and tenures including all types of affordable housing is required to meet Lambeth’s local housing needs. Affordable housing will be required in line with London Plan policies H4, H5 and H6 and Lambeth Local Plan policies H2 and H4.	R0044	Elisa Orlandi

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Proposals considered not sustainable since it proposes the demolition of existing buildings rather than their retrofit.	Any future detail proposals for Site 18 or any parcel within Site 18 will be subject to the planning application process and will be assessed against policies in Lambeth's Development Plan, which includes the London Plan, Lambeth Local Plan and, when adopted, the SADPD. London Plan policies SI 2 'Minimising greenhouse gas emissions' and SI 7 'Reducing waste and supporting the circular economy' are particularly relevant. Local Plan policy EN4 will also apply.	R0080 R0092 R0114 R0256 R0277	Norwood Society Green Group Councillors Francis Howcutt Helen Hayes MP Mark Fairhurst
Proposal not considered sustainable development since it would put the vitality and viability of the shopping centre at risk through the uplift in land values.	Local Plan Policy PN7 B confirms shopping uses in West Norwood/Tulse Hill district centre will be safeguarded and encouraged in an effort to promote the district centre as a hub for community life and retail, commercial and cultural activity. This policy also commits to ensuring any development within the centre enhances its viability and vitality. Local Plan Policy ED7 on Town Centres requires any major redevelopment proposals that come forward for Site 18 to re-provide on affordable terms any small shop premises that would be lost and ensure that these are available at the same time as the main elements of the development, subject to viability. This will be secured through conditions or, where appropriate, planning obligations.	R0092	Green Group Councillors
A shop ratio of 50% considered excessive in an era of online shopping.	Noted. Local Plan Policy ED11 states that, where new ground floor units are created within local centres, generally 50 per cent of this ground floor floorspace should be in commercial, business and service use. This is seen as a way to support and protect the role of local centres and local shops in meeting the day to day needs of communities. Active frontage uses, and particularly retail uses, are also encouraged and protected.	R0030 R0030a	Jackie Meldrum Jackie Meldrum
Support for retail uses being proposed as part of the allocation.	Support noted.	R0064	Elizabeth Rowland
Redevelopment will put local services and amenities under strain.	Developer contributions secured through the planning application process once planning applications are put forward for Site 18 or any parcel within Site 18 will help finance improvements to existing local infrastructure.	R0026 R0069 R0072	Christine Hinton Maggie Bacon Julia Finlay
Redevelopment will require upgrades to local infrastructure as well as new infrastructure and services (including	Developer contributions secured through the planning application process once planning applications are put forward for Site 18 or any parcel within Site 18 will help finance any new local infrastructure.	R0030 R0030a R0068	Jackie Meldrum Jackie Meldrum Sarah Bailey

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
bridges, schools, GP practices or dentists).			
No infrastructure concerns regarding wastewater network.	Noted.	R0022	Thames Water
The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.	Noted.	R0022	Thames Water
Support for improvements to the public realm.	Support noted.	R0064 R0292	Elizabeth Rowland Chris Agathangelou
More public realm required to attract independent cafes and shops.	Noted. The Council considers that wider footways and a new public space would enhance the public realm experience of West Norwood, benefiting the town centre and the wider community. The indicative approach to the allocation reflects this. However, the eventual width of the pavement, as well as the shape and size of the public space will be defined by applicants looking at developing that part of the site as part of the planning application process in consultation with Lambeth's Highways and Planning teams.	R0044	Elisa Orlandi
Supportive of planning obligations being sought to mitigate any impacts of development on local public realm and transport infrastructure.	Noted.	R0014	Transport for London
Redevelopment will negatively impact traffic in the area indefinitely.	Any future application for the development of any part of Site 18 will be accompanied by a Transport Assessment. This assessment will include a trip generation analysis and an assessment of the expected impacts on the local road and public transport networks. The Transport Assessment will also be required to include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development. If necessary, additional parking controls such as the introduction of a Controlled Parking Zone (CPZ) may be secured in mitigation for the development, to be funded by the developer. In line with London Plan policy T6, the development will be car-free and all new units would be secured permit free, meaning that residents and businesses on the site would not be entitled to parking permits to	R0026 R0156 R0217b R0297	Christine Hinton Dan Mischianu Edmund Neuberger James Forrester

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	park on-street if CPZ is introduced. The number of vehicular trips generated by development on site will therefore be limited, helping to minimise impacts on parking, congestion and air quality in the area.		
Additional public transport measures are required to minimise impact of proposals on traffic.	CIL and S106 contributions raised as part of the planning process for any detailed schemes proposed for Site 18 will help fund any upgrade works required to the existing transport infrastructure.	R0217b	Edmund Neuberger
Redevelopment will negatively impact traffic in the area throughout the duration of the works.	A Construction Management Plan will be secured as part of any planning application being put forward for the development of Site 18 or any part of it. The impact of construction traffic on local traffic will be assessed and managed as part of such Construction Management Plan.	R0068	Sarah Bailey
Development should be car free with vehicle access restricted to disabled persons' parking and servicing.	In line with London Plan policy T6, any development coming forward within Site 18 will be car-free. All new units will be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street if a Controlled Parking Zone (CPZ) was to be introduced. Any future development, despite having no general parking, will still provide disabled persons parking in line with Part E of London Plan policy T6. In regard to servicing, any future development within Site 18 will also need to comply with London Plan policy T7, particularly parts G and H of such policy.	R0014	Transport for London
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.	Agree to include new wording to clarify this point. PROPOSED CHANGE p.117 'Transport, movement and public realm' section. Amend sixth paragraph to read: "A suitable off-street servicing strategy for both the light industrial and residential uses should be demonstrated. <u>Where land use is linked to last mile distribution/logistics or 'just-in-time', servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u> "	R0014	Transport for London
Indicative layout has not been approved by Fire Brigade as providing suitable access to evacuate residents and fight fire if necessary.	It must be remembered that the Indicative Approach is not a proposal. It has been prepared solely to inform an understanding of site capacity. Development proposals on any of the parcels within the site will be put forward by applicants and follow the planning application process. In due course, detailed proposals will be submitted indicating layout and height of buildings. All parameters will be assessed against the local Development Plan, which includes the London Plan, Lambeth Local Plan and, when adopted, the	R0114	Francis Howcutt

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	SADPD. Fire Brigade accessibility is one of those parameters that will be assessed in detail at planning application stage, and they will be consulted as part of any planning application.		

Site 20: Tesco, 13 Acre Lane SW2

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Recognise need for new housing.	Noted.	R0109	Amar, Darshana, Jayantilal & Sushila Chudasama
		R0036	Anderson Lorentson
		R0019	Ben Mcguigan & Lucy Smith
		R0018a	Blandine Scalbert
		R0055	Celine Balleyguier
		R0106	Chris and Jess McCullagh
		R0041	Gaetano Cavaliere
		R0107	Harmit and Anita Kambo
		R0006b	Huma Farooqui
		R0101	Jessye Sutton
		R0047	Joao Sousa
		R0032	Josh Kaplan
		R0004b	Julian Rees
		R0100	Leon Kreitzman
		R0086	Margaret & Oliver Munns
		R0043	Maria Stalbow
		R0024	Matthew Pencharz
		R0104	Paddy E & James Harrower
		R0103	Thomas & Daniel Schiller
		R0046	Veena Srirangam
		R0105	Adi Luxmi & Patrick Joseph

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0054	Kathryn Ingleby
Existing site does not contribute to the town centre.	Noted.	R0020	Ray Weller
Area is already overpopulated.	<p>Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. New housing, in particular affordable and social housing, will help alleviate housing need within the borough and can reduce overcrowding in the local areas.</p> <p>All new development must contribute CIL in accordance with that revised Charging Schedule. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including social, transport and green infrastructure. In addition, site specific mitigation can be secured through s106 planning obligations in accordance with the policies in the Local Plan 2021 (e.g. policies D4, S2, T and EN policies). Local Plan Policy S2 also requires a social infrastructure statement to be submitted with all applications for over 25 units. This would assess the impact of the proposal existing social infrastructure and include appropriate provision for any additional need that would arise from the proposal.</p>	R0040 R0007	Trudy Lister Angela Moon
Site is well suited to new development.	Noted.	R0133	Henry Cooke
Increasing housing choice will help people buy and rent homes in the area.	Noted.	R0133	Henry Cooke
Support affordable and social housing.	Noted.	R0117 R0259 R0266	Tamsin Marsh Verity Owers Victoria Hastings
Development should focus on affordable / social housing.	Affordable housing will be sought in line with the London Plan Policy H1 and Policy H5. This requires at least 35% affordable housing to be delivered. Lambeth Local Plan Policy H2 and	R0023 R0164 R0172	Miranda MacAuley Janis Morton James Osborn

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	London Policy H6 require 70% of the affordable housing must be low cost rented homes (Social Rent/London Affordable Rent).	R0273	Angela Moon
Of the 35% affordable homes, only a proportion would be social rent. This is not sufficient to meet Brixton's needs.	Noted. The approach to affordable housing is consistent with London Plan and Local Plan policy.	R0117	Tamsin Marsh
Focus on flats threatens to drive out families from area. Families are leaving Lambeth, schools are having to close/merge. Development should focus on low-rise family sized homes.	The mix of homes will be fully considered at the time a planning application is brought forward on the site. Local Plan Policy H4 'Housing size mix in new developments will apply, this recognises the need for family accommodation, in particular family-sized affordable homes.	R0096 R0109 R0036 R0039 R007a R0119 R0018a R0055 R0106 R0167 R0041 R0107 R0006b R0172 R0164 R0101 R0264 R0004b	Alex Biddle Amar, Darshana, Jayantilal & Sushila Chudasama Anderson Lorentson Andrew Beale & Andreia Sangalli Angela Moon Ben Mcguigan & Lucy Smith Blandine Scalbert Celine Balleyguier Chris and Jess McCullagh Flora Scott-Barrett Gaetano Cavaliere Harmit and Anita Kambo Huma Farooqui James Osbourn Janis Morton Jessye Sutton Joshua Lubek Julian Rees

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0042 R0100 R0043 R0104 R0023 R0056 R0061 R0111 R0118 R0062 R0017 R0076 R0112 R0046 R0259 R0049	Karolina Korol Leon Kreitzman Maria Stalbow Paddy E & James Harrower Miranda MacAuley Nicolas le Moigne Nicolas Watson Richard Marsh Sarah Henderson & Tim Noble Stephen & Deborah Humphreys Tamsin Marsh Thibault Scalbert Thomas O'Flaherty & Alexandra Hulme Veena Srirangam Verity Owers Vinod Katri"
Proposal doesn't meet the needs of the local community or visitors to Brixton.	The proposal would provide various benefits to the local community. These include new housing and affordable housing, new improved retail facilities, a reduction in car parking at the site, and new improved public realm. Other public benefits may be secured through developer contributions and the Community Infrastructure Levy, such as skills and employment opportunities, and funding for improvements to local green spaces and social infrastructure.	R0039 R0057	Andrew Beale & Andreia Sangalli Paul Muller

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Closure of supermarket will impact on employees and residents who shop there.	The site allocation policy anticipates the future land use to include a replacement supermarket alongside new housing. While redevelopment takes place it is likely that a temporary supermarket is provided on part of the site to ensure no disruption to the local community.	R0216 R0035 R0144 R0054	Alice O'Connor Florence Henaff Josephine Wallman Kathryn Ingleby
The plan does not provide an alternative food shopping destination.	The site allocation policy anticipates the future land use to include a replacement supermarket.	R0216	Alice O'Connor
Concerned smaller retail units could replace supermarket.	The site allocation policy anticipates the future land use to include a replacement supermarket alongside new housing.	R0021	Gordon Bird
Supermarket should be maintained.	The site allocation policy anticipates the future land use to include a replacement supermarket alongside new housing.	R0172 R0032	James Osborn Josh Kaplan
The site allocation proposes too many homes.	The Site Allocation policy sets out the parameters for development of the site, based on high-level testing of the optimum development capacity that could in principle be accommodated on the site. This was undertaken using a design-led approach in accordance with London Plan Policies D1B(3) and D3. As stated in the design evidence paper, the indicative quantum included in the draft allocation are approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. Detailed planning assessment of design proposals at pre-application and planning application stage may also result in a variation on the indicative figures included in the draft site allocation policy.	R0087 R0109 R0036 R0039 R0033 R0018a R0055 R0106 R0217 R0035 R0167 R0041 R0107 R0006b	Adele Stewart Amar, Darshana, Jayantilal & Sushila Chudasama Anderson Lorentson Andrew Beale & Andreia Sangalli Blandine Baiget Blandine Scalbert Celine Balleyguier Chris & Jess McCullagh Edmund Neuberger Florence Henaff Flora Scott-Barrett Gaetano Cavaliere Harmit & Anita Kambo Huma Farooqui

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0101	Jessye Sutton
		R0042	Karolina Korol
		R0100	Leon Kreitzman
		R0086	Margaret & Oliver Munns
		R0043	Maria Stalbow
		R0104	Paddy E & James Harrower
		R0023	Miranda MacAuley
		R0056	Nicolas le Moigne
		R0061	Nicolas Watson
		R0011	Paddy Harrower
		R0111	Richard Marsh
		R0094	Rob Blakemore
		R0081	Samara Milford
		R0118	Sarah Henderson & Tim Noble
		R0037	Sheila Tugwell
		R0062	Stephen & Deborah Humphreys
		R0117	Tamsin Marsh
		R0050	Thelma Fletcher
		R0076	Thibault Scalbert
		R0112	Thomas O'Flaherty & Alexandra Hulme
		R0040	Trudy Lister
		R0046	Veena Srirangam
		R0259	Verity Owers

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0266	Victoria Hastings
		R0049	Vinod Katri
The proposals would be too dense and too high.	<p>The Site Allocation policy sets out the parameters for development of the site, based on high-level testing of the optimum development capacity that could in principle be accommodated on the site. This was undertaken using a design-led approach in accordance with London Plan Policies D1B(3) and D3. The indicative capacity has been assessed with regards to the site's constraints, ensuring that the indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban/urban locations. Detailed proposals will be assessed against all relevant development plan policies at the time an application is submitted.</p> <p>Applicants and their architects will need to undertake a further assessment of site capacity when designing detailed proposals for submission as a planning application, informed by the parameters set out in the site allocation policies and other relevant policies in the development plan.</p>	R0096 R0099 R0109 R0039 R0273 R0045a R0119 R0290 R0015 R0107 R0213 R0264 R0004b R0042 R0100 R0098 R0091 R0020 R0111 R0081 R0050	Alex Biddle Alistair Craggs & Jessye Sutton Amar, Darshana, Jayantilal & Sushila Chudasama Andrew Beale & Andreia Sangalli Angela Moon Beatriz Fernandez Ben Mcguigan & Lucy Smith Cllr David Bridson Fred Kelly Harmit & Anita Kambo Jessica Matthew Joshua Lubek Julian Rees Karolina Korol Leon Kreitzman Mark Gordon Neesha Gopal Ray Weller Richard Marsh Samara Milford Thelma Fletcher

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0076 R0103 R0112 R0040 R0049 R0101	Thibault Scalbert Thomas & Daniel Schiller Thomas O'Flaherty & Alexandra Hulme Trudy Lister Vinod Katri Jessye Sutton
Development would not accord with the principles of Lambeth Policy Q5.	The indicative approach is a tool to assess site capacity and not a detailed proposal. A detailed design prepared by the applicant and their architect at application stage would need to demonstrate full compliance with Local Plan design policy Q5.	R0280	Michael Bright
Proposal not consistent with design approach to maintain historic building line (these were not 9 storeys).	Building line refers to the line created by a building's frontage along the street, not the building heights.	R0260	Andrew Rees
The Design Evidence presents a street frontage along Acre Lane that would be a monolithic volume, with the servicing and customer access creating a canyon like gap. Court yard overlooking service area would have little amenity value.	The indicative approach set out within the evidence base is a tool to assess site capacity and not a detailed proposal. A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape, as well as providing protections to amenity.	R0281	HSBC Bank Pension Trust UK Ltd
Scale and mass of proposals out of character with surrounding context. Development should be similar scale to surrounding neighbourhood.	It is accepted that the indicative approach and resultant vision is taller than development in the surrounding context. However, the high accessibility of the site and its proximity to the town centre justify such an approach. The indicative approach in the design evidence document has been revisited and tested to ensure no unacceptable impacts to neighbours. The Indicative approach is a tool to assess site capacity and not a detailed proposal.	R0087 R0096 R0039 R0273 R0131	Adele Stewart Alex Biddle Andrew Beale & Andreia Sangalli Angela Moon Anthony Cowan

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape.</p> <p>The design evidence includes townscape and visual impact assessments from the nearby conservation areas. The current Tesco and car park do not contribute to the significance (including setting) of these designated assets. The reintroduction of enclosure, animation and high-quality architecture along Acre Lane will have beneficial effects on heritage settings.</p>	R0119	Ben McGuigan & Lucy Smith
		R0033	Blandine Baiget
		R0018a	Blandine Scalbert
		R0218	Catrina Slorach
		R0279	Cleo
		R0167	Flora Scott-Barrett
		R0035	Florence Henaff
		R0021	Gordon Bird
		R0107	Harmit and Anita Kambo
		R0012	Helen Edwards
		R0226	Igor Zumerimendi
		R0172	James Osmond
		R0005	Jeane Yarrow
		R0264	Joshua Lubek
		R0053	Julian Ingleby
		R0004b	Julian Rees
		R0042	Karolina Korol
		R0054	Kathryn Ingleby
		R0160	Michael Bright
		R0009	Micol Molinari
		R0056	Nicolas le Moigne
		R0104	Paddy E & James Harrower
		R0011	Paddy Harrower
		R0081	Samara Milford

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0112	Thomas O'Flaherty & Alexandra Hulme
		R0259	Verity Owers
		R0266	Victoria Hastings
		R0017	Victoria Todd
		R0105	Adi Luxmi & Patrick Joseph
		R0290	Cllr. David Bridson
		R0108	Elizabeth Burton
		R0213	Jessica Matthew
		R0086	Margaret & Oliver Munns
		R0117	Tamsin Marsh
Scale of development would harm nearby heritage assets.	<p>A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape.</p> <p>The design evidence includes townscape and visual impact assessments from the nearby conservation areas. The current Tesco and car park do not contribute to the significance (including setting) of these designated assets. The reintroduction of enclosure, animation and high-quality architecture along Acre Lane will have beneficial effects on heritage settings.</p>	R0096 R0036 R0018a R0218 R0055 R0106 R0167 R0041 R0107 R0006b R0101 R0100 R0086 R0043 R0098	Alex Biddle Anderson Lorentson Blandine Scalbert Catriona Slorach Celine Balleyguier Chris & Jess McCullagh Flora Scott-Barrett Gaetano Cavaliere Harmit & Anita Kambo Huma Farooqui Jessye Sutton Leon Kreitzman Margaret & Oliver Munns Maria Stalbow Mark Gordon

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0052 R0023 R0061 R0081 R0118 R0062 R0117 R0046	Mary Santos Miranda MacAuley Nicolas Watson Samara Milford Sarah Henderson & Tim Noble Stephen & Deborah Humphreys Tamsin Marsh Veena Srirangam
Site Allocation could damage the unique character of Brixton's residential area.	<p>A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape.</p> <p>The design evidence includes townscape and visual impact assessments from the nearby conservation areas. The current Tesco and car park do not contribute to the significance (including setting) of these designated assets. The reintroduction of enclosure, animation and high-quality architecture along Acre Lane will have beneficial effects on heritage settings.</p> <p>A higher density development is considered appropriate in this highly accessible (PTAL 6a) and sustainable location, being within a Major Town Centre and in close proximity to Brixton Underground and National Rail stations. The site Vision explicitly requires that proposals address the “current poor appearance of the site through high quality design, which responds well to its sensitive context adjoining conservation areas”. No change required.</p>	R0087 R0036 R0018a R0055 R0106 R0167 R0035 R0041 R0006b R0043 R0052 R0023 R0081 R0062 R0046	Adele Stewart Anderson Lorentson Blandine Scalbert Celine Balleyguier Chris & Jess McCullagh Flora Scott-Barrett Florence Henaff Gaetano Cavaliere Huma Farooqui Maria Stalbow Mary Santos Miranda MacAuley Samara Milford Stephen & Deborah Humphreys Veena Srirangam

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Scale and height do not follow Lambeth's guidelines on heritage assets.	Disagree. The guiding approach in developing the draft site allocation policies is design-led optimisation of development capacity, as required by London Plan Policy D3. The indicative approach is a tool to assess site capacity and not a detailed proposal. A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape.	R0111 R0117	Richard Marsh Tamsin Marsh
Buildings on this site have never exceeded four storeys.	Replicating the existing heights on site has no basis in policy. London plan Policy D3 requires that development optimises the capacity of sites through a design-led approach. It is accepted that the indicative approach and resultant vision is taller than development in the surrounding context. However, the site's high accessibility (PTAL 6a - Excellent) and its proximity to the town centre justify such an approach. The indicative approach in the design evidence document has been revisited and tested to ensure no unacceptable impacts to neighbours.	R0033 R0018a R0279	Blandine Baiget Blandine Scalbert Cleo
The location (outside of CAZ or OA) is not suitable for a cluster of tall buildings.	The heights identified for the indicative model in the evidence base do not meet the local plan policy definition of a tall building, which is 45m when located north of the South Circular Road.	R0092	Green Group Councillors
The PSV does not indicate acceptable building heights within the site itself. This could allow for a 45m building. The site allocation should provide detailed guidance on maximum building heights.	Given the heritage constraints and character of the locality, the site is identified as not being suitable for a tall building, and a tall building in this location would be considered to be 45m or above (as set out in Lambeth Local Plan Policy Q26). The Council does not consider it helpful to place further height constraint in the allocations policy. This is because there are no protected views or heritage settings that set precise limitations, and it is considered applicants, and their architects need a degree of freedom to ensure site development is optimised in a manner that is responsive to its context.	R0079 R0096 R0036 R007a R0018a R0055 R0106 R0167 R0041 R0107 R0006b R0042	Brixton Society Alex Biddle Anderson Lorentson Angela Moon Blandine Scalbert Celine Balleyguier Chris & Jess McCullagh Flora Scott-Barrett Gaetano Cavaliere Harmit & Anita Kambo Huma Farooqui Karolina Korol

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0100 R0043 R0052 R0023 R0056 R0061 R0111 R0081 R0118 R0062 R0017 R0076 R0046 R0259 R0049 R0092	Leon Kreitzman Maria Stalbow Maria Santos Miranda MacAuley Nicolas le Moigne Nicolas Watson Richard Marsh Sam Milford Sarah Henderson & Tim Noble Stephen & Deborah Humphreys Tamsin Marsh Thibault Scalbert Veena Srirangam Verity Owers Vinod Katri Green Group Councillors
Without a maximum building height the site allocation would encourage speculation. Increased land values will make affordable housing less viable.	Given the heritage constraints and character of the locality, the site is identified as not being suitable for tall building, and a tall building in this location would be considered to be 45m or above (as set out in Lambeth Local Plan Policy Q26), there is defined maximum height. The Council does not consider it helpful to place further height constraint in the allocations policy. This is because there are no protected views or heritage settings that set precise limitations, and it is considered applicants, and their architects need a degree of freedom to ensure site development is optimised in a manner that is responsive to its context. Planning Policy Guidance explicitly states that prices paid for land cannot be used to justify reductions in affordable housing. The site value has to be based on existing use value, and this	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	approach has been followed in the viability assessment. Existing use value is unaffected by the SADPD. No change required.		
Proposals would be overbearing.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbouring relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0099 R0109 R0119 R0033 R0279 R0217 R0021 R0107 R0012 R0226 R0172 R0101 R0009 R0037 R0117 R0103 R0050 R0076 R0112 R0040 R0259	Alistair Craggs & Jessye Sutton Amar, Darshana, Jayantilal & Sushila Chudasama Ben McGuigan & Lucy Smith Blandine Baiget Cleo Edmund Neuberger Gordon Bird Harmit & Anita Kambo Helen Edwards Igor Zurimendi James Osborn Jessye Sutton Micol Molinari Sheila Tugwell Tamsin Marsh Thomas & Daniel Schiller Thelma Fletcher Thibault Scalbert Thomas O'Flaherty & Alexandra Hulme Trudy Lister Verity Owers

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0017	Victoria Todd
Previous concerns regarding proposed height, bulk and massing not addressed, and scale now increased.	The council has considered all relevant matters raised during the previous consultation. The Council's response to each representation can be found in the Regulation 18 Consultation Report within the Examination Library.	R0092	Green Group Councillors
Proposals will increase wind turbulence around site.	Any applicant would have to develop a proposal that is compliant with all the relevant neighbour amenity requirements under Local Plan Policy Q2. This requires that outdoor amenity space is not affected by unacceptable wind/downraughts.	R0006 R0084 R0017	Huma Farooqui Regina Manicom Victoria Todd
Proposals will lead to noise and disruption to existing residents.	Any applicant would have to develop a proposal that is compliant with all the relevant neighbour amenity requirements under Local Plan Policy Q2. This requires that the adverse impacts of noise are reduced to an acceptable level through the use of attenuation, distance, screening, or layout/orientation in accordance with London Plan policy D14.	R0087 R0111 R0117	Adele Stewart Richard Marsh Tamsin Marsh
Scale of development would cause overshadowing / daylight sunlight issues on existing homes.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards' which protect against unacceptable impact on levels of amenity, including any effect on daylight and sunlight. Applicants will have to show how they have responded to sensitive neighbours in an acceptable manner.	R0087 R0131 R0116 R0118d R0279 R0015 R0021 R0101 R0264 R0042 R0129 R0084 R0094 R0076	Adele Stewart Anthony Cowan Barbara & Peter Melrose Blandine Scalbert Cleo Fred Kelly Gordon Bird Jessye Sutton Joshua Lubek Karolina Korol Peter Melrose Regina Manicom Rob Blakemore Thibault Scalbert

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0266	Victoria Hastings
Overlooking / lack of privacy for existing residents.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy as required by relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Policy Q2 requires new development to provide adequate outlooks, avoiding wherever possible any undue sense of enclosure or unacceptable levels of overlooking (or perceived overlooking).	R0101 R0053 R0050	Jessye Sutton Julian Ingleby Thelma Fletcher
Residential neighbours should include Cedars House 48-50 Acre Lane.	It is not necessary to list all residential neighbours within the site allocation policy. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Compliance would not be limited to only the sensitive properties shown on the vision map. Note that 48-50 Acre Lane is identified as a Listed Building on the context map on p73 of the SADPD PSV.	R0116	Barbara and Peter Melrose
A maximum height of 30m should be appropriate at agreed key points within the site where the impact on townscape, heritage and daylight of adjacent neighbours could be kept to a minimum.	It is not appropriate for this site allocation to set specific building heights and setbacks from neighbouring properties. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').		
Maximum height should be six storeys at less sensitive parts of the site stepping down to three near to Baytree Road and Porden road.	It is not appropriate for the site allocation to set specific building heights and setbacks from neighbouring properties. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0260 R0172 R0079	Andrew Rees James Osbourne Brixton Society
Ivor House to the east of the site should set the precedent for maximum height.	It is not appropriate for the site allocation to set specific building heights and setbacks from neighbouring properties. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0259	Verity Owers
There should be good separation distances between existing residential.	Noted. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0172	James Osborn
Maximum height should be one storey above houses on Baytree Road and Porden road.	It is not appropriate for the site allocation to specific building heights and setbacks distances from neighbouring properties. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-	R0036 R0018a R0055 R0167 R0041 R0107	Anderson Lorentson Blandine Scalbert Celine Balleyguier Flora Scott-Barrett Gaetano Cavaliere Harmit and Anita Kambo

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0006b R0043 R0094 R0062 R0046	Huma Farooqui Maria Stalbow Rob Blakemore Stephen & Deborah Humphreys Veena Srirangam
Any building within 50m of the domestic two-storey properties on Baytree and Porden Road should be limited to 9m tall.	It is not appropriate for the site allocation to specific building heights and setbacks in relation to neighbouring properties Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0076	Thibault Scalbert
Any building within 30m of the domestic two-storey properties on Baytree and Porden Road should be limited to 9m tall.	It is not appropriate for the site allocation to set specific building heights and setbacks in relation to neighbouring properties. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0096 R0036 R0039 R0018a R0055 R0106 R0041 R0107 R0006b R0101 R0053 R0100 R0043	Alex Biddle Anderson Lorentson Andrew Beale & Andreia Sagalli Blandine Scalbert Celine Balleyguier Chris & Jess McCullagh Gaetano Cavaliere Harmit & Anita Kambo Huma Farooqui Jessye Sutton Julian Ingleby Leon Kreitzman Maria Stalbow

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0061 R0111 R0094 R0062 R0117 R0046 R0259	Nicolas Watson Richard Marsh Rob Blakemore Stephen & Deborah Humphreys Tamsin Marsh Veena Srirangam Verity Owers
The highest point of the development should be along Acre Lane (at 15m), this should step down to 9m to reduce impact on the low-rise housing on Baytree and Porden Roads.	It is not appropriate for the site allocation to set specific building heights and setbacks. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy, outlook and sense of enclosure constraints as required by the relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards').	R0096 R0036 R0018a R0055 R0041 R0107 R0006b R0164 R0101 R0053 R0042 R0100 R0043 R0061 R0111 R0094 R0118 R0062	Alex Biddle Anderson Lorentson Blandine Scalbert Celine Balleyguier Gaetano Cavaliere Harmit & Anita Kambo Huma Farooqui Janis Morton Jessye Sutton Julian Ingleby Karolina Korol Leon Kreitzman Maria Stalbow Nicolas Watson Richard Marsh Rob Blakemore Sarah Henderson & Tim Noble Stephen & Deborah

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0117 R0076 R0046	Humphreys Tamsin Marsh Thibault Scalbert Veena Srirangam
The same principles for 'Height, scale and massing' that were applied to 47-49 Acre Lane should be applied to this site.	Noted. However, that is a significantly smaller site and doesn't offer the capacity for site optimisation presented by the much longer and deeper Tesco site.	R0096 R0036 R0039 R0260 R0018a R0055 R0106 R0290 R0041 R0107 R0006b R0101 R0053 R0054 R0100 R0043 R0061 R0111 R0094 R0118	Alex Biddle Anderson Lorentson Andrew Beale & Andreia Sagalli Andrew Rees Blandine Scalbert Celine Balleyguier Chris and Jess McCullagh Cllr David Bridson Gaetano Cavaliere Harmit & Anita Kambo Huma Farooqui Jessye Sutton Julian Ingleby Kathryn Ingleby Leon Kreitzman Maria Stalbow Nicolas Watson Richard Marsh Rob Blakemore Sarah Henderson & Tim Noble

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0062	Stephen & Deborah Humphreys
		R0117	Tamsin Marsh
		R0046	Veena Srirangam
		R0259	Verity Owers
Development should allow for more green spaces / parks.	While the site allocation does not specify the location of open spaces, any future planning application would need to address existing open space deficiency and improve access to nature in accordance with Local Plan Policy EN1(d). Children's play space would be required in accordance with London Plan Policy S4, while the allocation encourages development to incorporate children and young people-friendly features into landscaping.	R0096	Alex Biddle
		R0036	Anderson Lorentson
		R0039	Andrew Beale & Andreia Sagalli
		R0018a	Blandine Scalbert
		R0055	Celine Balleyguier
		R0167	Flora Scott-Barrett
		R0106	Chris and Jess McCullagh
		R0041	Gaetano Cavaliere
		R0107	Harmit and Anita Kambo
		R0006b	Huma Farooqui
		R0101	Jessye Sutton
		R0100	Leon Kreitzman
		R0043	Maria Stalbow
		R0023	Miranda MacAuley
		R0057	Paul Muller
		R0111	Richard Marsh
		R0081	Samara Milford
		R0118	Sarah Henderson & Tim Noble
		R0262	Stefan Lubek

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0062	Stephen & Deborah Humphreys
		R0117	Tamsin Marsh
		R0050	Thelma Fletcher
		R0046	Veena Srirangam
Green space should be provided along boundaries of Baytree Road and Porden Road.	While the site allocation does not specify the location of open spaces, any future planning application would need to address existing open space deficiency and improve access to nature in accordance with Local Plan Policy EN1(d).	R0105	Adi Luxmi & Patrick Joseph
		R0096	Alex Biddle
		R0109	Amar, Darshana, Jayantilal & Sushila Chudasama
		R0119	Ben McGuigan & Lucy Smith
		R0036	Anderson Lorentson
		R0039	Andrew Beale & Andreia Sagalli
		R0018a	Blandine Scalbert
		R0055	Celine Balleyguier
		R0167	Flora Scott-Barrett
		R0106	Chris and Jess McCullagh
		R0041	Gaetano Cavaliere
		R0107	Harmit and Anita Kambo
		R0006b	Huma Farooqui
		R0101	Jessye Sutton
		R0264	Joshua Jubek
		R0053	Julian Ingleby
		R0004b	Julian Rees
		R0042	Karolina Korol

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0100 R0043 R0023 R0104 R0057 R0111 R0094 R0081 R0118 R0262 R0062 R0117 R0076 R0046 R0259	Leon Kreitzman Maria Stalbow Miranda MacAuley Paddy E & James Harrower Paul Muller Richard Marsh Rob Blakemore Samara Milford Sarah Henderson & Tim Noble Stefan Lubek Stephen & Deborah Humphreys Tamsin Marsh Thibault Scalbert Veena Srirangam Verity Owers
The site currently performs in some ways like an open space, creating a break in the urban form. Open space should be visible from the road. This should include children's play space.	<p>While the existing car park provides a break in the urban form, in its current state it provides none of the positive qualities usually associated with open space, such as providing opportunities for leisure, recreation and sport, improving health and wellbeing, supporting air quality, habitats and species, and for its contribution to visual amenity, sustainable urban drainage, urban cooling and ecological function.</p> <p>Although the site allocation does not specify the location of open spaces, any future planning application would need to address existing open space deficiency and improve access to nature in accordance with Local Plan Policy EN1(d). Improvements to the public realm may provide</p>	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>opportunities to introduce urban greening visible from Acre Lane, however, the location of any open space delivered will need to be considered against other planning matters, such as ensuring privacy for residents, overlooking of playspace, and ensuring open amenity space is not unduly impacted by noise from traffic and pollution.</p> <p>Children's play space would be required in accordance with London Plan Policy S4, while the allocation encourages development to incorporate children and young people-friendly features into landscaping.</p>		
The current boundary wall height should be maintained to protect privacy. Proposal ignores 1985 planning condition to maintain boundary wall between Baytree Road and Arlington Lodge.	<p>Impact on neighbour amenity will be fully considered as part of any future planning application.</p> <p>Pre-existing planning conditions and the reasons they were imposed may be a material consideration when determining a future planning application if these remain relevant.</p>	R0096 R0273 R0036 R0039 R0018a R0055 R0106 R0167 R0041 R0107 R0006b R0164 R0101 R0100 R0043 R0086 R0052 R0023 R0084	Alex Biddle Angela Moon Anderson Lorentson Andrew Beale & Andreia Sagalli Blandine Scalbert Celine Balleyguier Chris and Jess McCullagh Flora Scott-Barrett Gaetano Cavaliere Harmit and Anita Kambo Huma Farooqui Janis Morton Jessye Sutton Leon Kreitzman Maria Stalbow Margaret & Oliver Munns Mary Santos Miranda MacAuley Regina Manicom

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0111 R0081 R0062 R0117 R0076 R0046 R0259 R0049	Richard Marsh Samara Milford Stephen & Deborah Humphreys Tamsin Marsh Thibault Scalbert Veena Srirangam Verity Owers Vinod Katri
The Tesco boundary wall is subsiding.	Noted.	R0231	James Harrower
Existing issues of anti-social behaviour could be exacerbated.	Any future planning applications will need to demonstrate compliance with Policy Q3 of the Local Plan. This requires development to design out opportunistic crime, anti-social behaviour, violence and fear of crime in a site-specific manner, based on an understanding of the locality and likely crime and safety issues it presents. Secure by Design officers are required to scrutinise planning applications and provide advice for schemes of this size.	R0045a R0035 R0057 R0040	Beatriz Fernandez Florence Henaff Paul Muller Trudy Lister
Buildings to the south and west of the site should be townhouses and not flats.	Noted. The Indicative approach is a tool to assess site capacity and not a detailed proposal. While town houses could form part of a future design response, we do not consider it appropriate to specify building typologies within the site allocation policy.	R0096 R0036 R0039 R0018a R0055 R0106 R0167 R0041 R0107 R0006b	Alex Biddle Anderson Lorentson Andrew Beale & Andreia Sagalli Blandine Scalbert Celine Balleyguier Chris and Jess McCullagh Flora Scott-Barrett Gaetano Cavaliere

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0101 R0053 R0054 R0100 R0043 R0061 R0111 R0094 R0118 R0262 R0062 R0117 R0076 R0046 R0259	Harmit and Anita Kambo Huma Farooqui Jessye Sutton Julian Ingleby Kathryn Ingleby Leon Kreitzman Maria Stalbow Nicolas Watson Richard Marsh Rob Blakemore Sarah Henderson & Tim Noble Stefan Lubek Stephen & Deborah Humphreys Tamsin Marsh Thibault Scalbert Veena Srirangam Verity Owers
A courtyard design would maximise housing rather than a taller building.	Noted. The Indicative approach is a tool to assess site capacity and not a detailed proposal. While courtyard blocks could form part of a future design response, it is not the intention of the site allocation policy to specify building typologies.	R0092	Green Group Councillors
Site is well located to local amenities and public transport.	Noted.	R0200	James Seabridge
Placing car park in basement is preferable.	Noted. While this may provide one potential design solution, it is not the intention of the site allocation to specify the precise location of any future car parking.	R0020	Ray Weller

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
No parking permits should be provided except to registered disabled people.	In line with London Plan policy T6 all units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. This would allow for some appropriate disabled persons parking for Blue Badge holders.	R0096	Alex Biddle
		R0036	Anderson Lorentson
		R0039	Andrew Beale & Andreia Sangalli
		R007a	Angela Moon
		R0119	Ben Mcguigan & Lucy Smith
		R0018a	Blandine Scalbert
		R0055	Celine Balleyguier
		R0106	Chris and Jess McCullagh
		R0167	Flora Scott-Barrett
		R0041	Gaetano Cavaliere
		R0107	Harmit and Anita Kambo
		R0006b	Huma Farooqui
		R0226	Igor Zurimendi
		R0053	Julian Ingleby
		R0100	Leon Kreitzman
		R0043	Maria Stalbow
		R0052	Mary Santos
		R0023	Miranda MacAuley
		R0081	Samara Milford
		R0118	Sarah Henderson & Tim Noble
		R0062	Stephen & Deborah Humphreys
		R0112	Thomas O'Flaherty & Alexandra Hulme

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0046 R0259 R0049 R0103 R0014	Veena Srirangam Verity Owers Vinod Katri Thomas & Daniel Schillert Transport for London
The current unsafe service access appears to be retained and is not properly addressed.	<p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. Redevelopment provides an opportunity to improve these arrangements. A material reduction in car parking is required by the site allocation policy, therefore the number of vehicle movements related to customer parking along Baytree Road is expected to be reduced.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p> <p>The existing restrictions to prevent rat running on Baytree Road would also remain, i.e. Baytree Road would remain no entry from Brixton Hill, and vehicles would be exit only from the service yard, with all HGVs turning right towards Acre Lane.</p>	R0172 R0164 R0053 R0042 R0100 R0061 R0111 R0118 R0117 R0050 R0076 R0049	James Osborn Janis Morton Julian Ingleby Karolina Korol Leon Kreitzman Nicolas Watson Richard Marsh Sarah Henderson & Tim Noble Tamsin Marsh Thelma Fletcher Thibault Scalbert Vinod Katri
If Tesco remain, the deliveries entrance and waste collection should occur on the Acre Lane side.	<p>The existing retail servicing route would be retained, i.e. in from Acre Lane / out via Baytree Road. Redevelopment provides an opportunity to improve these arrangements. The site allocation is supportive of enclosing the retail service areas.</p> <p>Any future planning application will be accompanied by a Transport Assessment, along with draft Delivery and Servicing Management, Construction and Environmental Management and Travel Plans. Full Plans will be secured and assessed via appropriate planning conditions.</p>	R0096	Alex Biddle
Traffic and parking need careful attention.	Noted.	R0045a R0053	Beatriz Fernandez Julian Ingleby

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Where will residents park their cars? Clarification is needed about Disabled Access, Disabled Bay Parking, Parking for Delivery Vehicles, Skilled Labour Vehicles, Waste Collections and any Residents' Parking arrangement.	In line with London Plan policy T6 all residential units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. This would allow for some appropriate disabled persons parking for Blue Badge holders. Development will be required to make adequate provision for deliveries, servicing and emergency access. In regards to the supermarket, a material reduction in levels of car parking will be required, to achieve key London Plan, 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.	R0021	Gordon Bird
Development will exacerbate congestion/parking issues.	In line with London Plan policy T6 all residential units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. This would allow for some appropriate disabled persons parking for Blue Badge holders. In regards to the supermarket, a material reduction in levels of car parking will be required, to achieve key London Plan, 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.	R0017 R0007	Victoria Todd Angela Moon
Tesco's Parking is an appreciated local benefit, important for visitors to town centre and tradesmen.	Noted. While the site allocation expects a material reduction in the level of parking on site, some parking is expected to be maintained on site.	R0018a R0011 R0037	Blandine Scalbert Paddy Harrower Sheila Tugwell
Development should be car free.	In line with London Plan policy T6 all residential units would be secured permit free, meaning residents and businesses on the site would not be entitled to parking permits to park on-street. In regards to the supermarket, 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.	R0200 R0213	James Seabridge Jessica Matthew
Tesco car park should not be replaced.	Noted. While the site allocation expects a material reduction in the level of parking on site, some parking is expected to be maintained on site.	R0098	Mark Gordon

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Recommend a design-led approach to optimising housing provision at other sites identified in this response.	A design led approach to optimising capacity has been taken across all thirteen site allocations.	R0092	Green Group Councillors
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.	Lambeth as Local Planning Authority must plan to meet and exceed its borough-level housing delivery target set out in the Mayor's London Plan, in order to help meet London's housing need. For Lambeth, the target is at least 1,335 net additional dwellings to be completed every year during the ten year period from 2019/20 to 2028/29. Every site in the borough that is suitable and available for housing should contribute towards achieving this target, and the Mayor's London Plan requires the development capacity of all sites to be optimised in accordance with a design-led approach. The Local Plan 2021 committed the Council to preparing the SADPD to provide further certainty on how the sites could come forward; this is confirmed in the Inspector's Report issued 22 July 2021 (ref. PINS/N5660/429/7 para 66).	R0079	Brixton Society
Sites with high PTAL suitable for densification.	Noted.	R0024	Matthew Pencharz
Development will make the area more vibrant.	Noted.	R0133	Henry Cooke
Construction work will disrupt local residents.	The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.	R0090 R0084 R0099	Kathryn Ellinger-Gane Regina Manicom Alistair Craggs & Jessye Sutton
Impact of development should be fully explained and represented at hearing.	Noted.	R0160	Michael Bright

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Commercial development should be limited to a use appropriate to residential area, e.g. no night clubs or bars.	If a detailed planning application is submitted which includes a commercial use, this would be assessed against Local Plan Policy ED7 (Town Centres) and other relevant policies such as ED8 (Evening Economy and food and drink uses) and ED1 (Offices). Where necessary and justified, the council will use conditions and/or planning obligations to limit uses to control the impact of food and drink uses on local amenity. Conditions may also be used to restrict changes of use within Class E use categories to achieve town centre policies.	R0037	Sheila Tugwell
Development will turn into buy to let and AirBnB or be left empty.	Ownership is not a planning matter and cannot be considered in planning decisions. Legislation requires that properties in London are only authorised for short term lets of up to 90 days a year. Anything above this would require planning permission for a change of use.	R0164	Janis Morton
Development may reduce property values.	The effect of new development on property values is not a planning matter and cannot be considered in planning decisions. However, the impact of any future development proposal on neighbour residential amenity will be considered under any future planning application for this site.	R0090 R0107	Kathryn Ellinger-Gane Harmit and Anita Kambo
Service charges will be unaffordable.	Service charges are not a planning matter and cannot be considered in planning decisions.	R0164	Janis Morton
Support the joint response put forward by residents' group.	Noted.	R0079 R0106 R0107 R0111 R0117	Brixton Society Chris and Jess McCullagh Harmit and Anita Kambo Richard Marsh Tamsin Marsh
Original objections on impacts on neighbours in terms of overlooking, enclosure and outlook have been ignored.	The council has considered all relevant matters raised during the previous consultation. The council's response to each representation can be found in the Regulation 18 Consultation Report within the Examination Library.	R0087 R0079 R0036 R007a R0018a R0106 R0041 R0107	Adele Steward Brixton Society Anderson Lorentson Angela Moon Blandine Scalbert Chris and Jess McCullagh Gaetano Cavaliere Harmit and Anita Kambo

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
		R0006b R0101 R0042 R0100 R0086 R0043 R0052 R0023 R0056 R0061 R0111 R0081 R0118 R0062 R0017 R0076 R0046 R0259 R0049	Huma Farooqui Jessye Sutton Karolina Korol Leon Kreitzman Margaret & Oliver Munns Maria Stalbow Mary Santos Miranda MacAuley Nicolas le Moigne Nicolas Watson Richard Marsh Samara Milford Sarah Henderson & Tim Noble Stephen & Deborah Humphreys Tamsin Marsh Thibault Scalbert Veena Srirangam Verity Owers Vinod Katri
The council has not provided a response to previous comments made at Reg 18.	The council considered all representations made at Regulation 18. The council's response to these is available in the Regulation 18 consultation report.	R0076	Thibault Scalbert
Community were not properly informed / consulted on proposals.	The Council acknowledged that not all previous respondents were notified of the Regulation 19 consultation, and re-opened the Regulation 19 consultation on the SADPD for an additional 8	R0087 R0033	Adele Steward Blandine Baiget

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	weeks between 18 June and 13 August 2024. Consultation has been undertaken in a manner fully consistent with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement 2020. A Consultation and Engagement Plan for the Regulation 18 consultation on the Draft SADPD was agreed by Cabinet on 13 December 2021. Further details are set out in this Regulation 22 Consultation Statement.	R0018a R0106 R0006 R0005 R0144 R0011 R0094 R0135 R0076	Blandine Scalbert Chris and Jess McCullagh Huma Farooqui Jeane Yarrow Josephine Wallman Paddy Harrower Rob Blakemore T Thibault Scalbert
The SADPD consultation is technical and requires a more detailed understanding of planning than most people will have.	Noted. The SADPD is a technical planning policy document, we recognise that some aspects of the consultation may not always be easy to understand for non-professionals. Officers, through various engagement activities throughout the preparation of the document, have been mindful of this and have attempted to explain the content and process in a simplified way.	R0024	Matthew Pencharz
Consultation and proposals are difficult to understand.	Noted. The SADPD is a technical planning policy document, we recognise that some aspects of the consultation may not always be easy to understand for non-professionals. Officers, through various engagement activities throughout the preparation of the document, have been mindful of this and have attempted to explain the content and process in a simplified way.	R0231	James Harrower
The decision making process must be transparent and inclusive, and accessible for non-professionals.	Noted. The Council is committed to ensuring that the decision-making process remains transparent, inclusive, and accessible to all members of the community. Any future planning application will be determined in accordance with the Development Management Procedure Order 2015. This requires that local planning authorities to undertake a formal period of public consultation, prior to deciding a planning application.	R0087 R0231	Adele Steward James Harrower
Told by Councillor that Officers would ignore a 'copy and paste' response from residents. This is not democratic.	The Council is required to consider all relevant planning matters put forward, having regard to all statements of representation submitted during the consultation period. All representations received to Regulation 19 consultation will be submitted to the Planning Inspector and considered as part of the examination process.	R0117	Tamsin Marsh

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Scale of development raises significant environmental concerns.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of environmental protection alongside climate change mitigation and adaptation; and new guidance has been published by the Mayor of London on delivering net-zero buildings. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning proposals coming forward on the site allocation, in addition to the energy and sustainability, Biodiversity and urban greening requirements set out within the site allocation policy. The site allocation policies also make clear that development coming forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.	R0007 R0006 R0084 R0111	Angela Moon Huma Farooqui Regina Manicom Richard Marsh
Supportive of additional text which acknowledges bore hole and ground water protection.	Noted.	R0282	Environment Agency
Loss of supermarket will result in additional car journeys and emissions.	The site allocation policy anticipates a replacement supermarket alongside new housing as part of the intended land use. While redevelopment takes place it is likely that a temporary supermarket is provided on part of the site to ensure no disruption to the local community.	R0054	Kathryn Ingleby
Brixton ranks second lowest for tree canopy cover.	Noted. Protecting and enhancing biodiversity in Lambeth is a key objective of the council. London Plan Policy G6 and Local Plan Policy EN1 seek to protect, enhance, create and/or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy. Local Plan Policy EN1 seeks to resist development that would result in the loss, reduction in area or significant harm to the nature conservation or biodiversity value of an open space unless adequate mitigation or compensatory measures are included, appropriate to the nature conservation value of the assets involved. Local Plan Policy EN1 (d) requires major development in areas of open space deficiency and/ or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. London Plan Urban Greening Factor (PolicyG5) requirements will also apply. In addition, the new Biodiversity	R0167 R0273 R0023 R0111 R0081 R0117	Flora Scott-Barrett Angela Moon Miranda MacAuley Richard Marsh Samara Milford Tamsin Marsh

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Net Gain requirements in the Environment Act 2021 will apply to any future planning application at this site. This will require new development to achieve a 10% net gain in biodiversity.		
Development would exacerbate health issues.	The site allocation has potential for various positive outcomes to health in the local population. The site allocation encourages new housing and affordable housing, therefore helping mitigate against overcrowding and its negative impacts on health. The site allocation will require a reduction in the level of car parking associated with the Tesco store, while residential element will be limited to disabled parking only. The site allocation facilitates significant improvement to the pedestrian environment, including wider footway along Acre Lane and urban greening; and improved cycle infrastructure. Together, these will help reduce car use and the associated emissions, while creating a more accessible and inclusive environments and encourage walking, cycling and use of public transport. New green infrastructure and improvements to biodiversity will also help to improve health and well-being for those living, working and visiting in the area and the allocation policy states that additional urban greening should be provided in association with a widened footway along Acre Lane (whilst also retaining existing trees of value). New housing will be expected to achieve high levels of energy performance in accordance with London Plan Policy SI 2, which will reduce carbon emissions and fuel bills.	R0084	Regina Manicom
Tall buildings are less sustainable / environmentally friendly than lower ones.	While we do not consider the site to be appropriate for a tall building, site capacity will be expected to be optimised in line with the design-led approach set out under London Policy D3. Given the site has excellent access to jobs, services, infrastructure and amenities, a higher density development is considered appropriate in this location. There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation; and new guidance has been published by the Mayor of London on delivering net-zero buildings. This is in addition to the existing and emerging new requirements through the Building Regulations regime (such as the emerging Future Homes Standard). All existing and emerging policy, guidance and regulations will be applied to planning applications coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming forward	R0006	Huma Farooqui

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.		
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.	Noted.	R0014	Transport for London
Welcome amended wording in the Transport, Movement and Public Realm section. 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.'	Noted.	R0014	Transport for London
Do not envisage infrastructure concerns regarding wastewater networks in relation to this development.	Noted.	R0022	Thames Water

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Scale of development likely to require upgrades of the water supply network infrastructure. Applicant to notify Thames Water ahead of development.	Noted. Developers will need to liaise with Thames Water when drawing up development proposals to ensure water supply and wastewater networks can support a scheme.	R0022	Thames Water

Site 21: 51-65 Effra Road SW2

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Support reduction in site area.	Support noted.	R0079 R0256 R0287	Brixton Society Helen Hayes MP JLL on behalf of LPPI Real Estate Fund
Support allocation of site for redevelopment.	Support noted.	R0027 R0287	Jan Brasching JLL on behalf of LPPI Real Estate Fund
Sheltered housing is not forthcoming on Site 14.	Noted. The site allocation boundary was amended to remove the existing sheltered housing following Reg 18 consultation, therefore there is no need to re-provide this as part of the proposed land use mix.	R0079	Brixton Society
Mosaic Centre must be safeguarded.	Noted. The site allocation boundary was amended to remove the Mosaic Centre after the Reg 18 consultation.	R0256	Helen Hayes MP
Page 88 amend wording 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.	Change not accepted. While CEZ policies promote a mix of different workspace typologies, we consider a flexible light industrial use to be the most appropriate in this location. Local Plan Policy ED1 requires that proposals for smaller office space (less than 1,000sqm) in this location would be subject to the sequential test in section 7 of the NPPF and other plan policies.	R0287	JLL on behalf of LPPI Real Estate Fund
Employment floorspace should be placed in a separate block adjacent to the existing Link Business Centre to enable a wider range of employment activities.	We do not consider it appropriate to specify the layout of buildings within the Site Allocations policy.	R0079	Brixton Society

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Retain mix of retail and light industrial at ground floor with housing above.	Noted. The site allocation is supportive of development providing light industrial floorspace alongside residential on upper floors. As the site is in an 'edge of centre' location, proposals for town centre uses would be assessed against the sequential test and impact assessment set out in the NPPF.	R0092	Green Group Councillors
SA policy is inconsistent with other policies in the LP, including the role of Brixton town centre in the hierarchy of town centres.	Disagree. The site is not located within the Brixton Town Centre boundary, therefore Local Plan Policy ED7 does not apply. The places and neighbourhoods policy for Brixton (PN3) does not provide protection for retail park development. The site allocation promotes new light industrial workspace appropriate to the Brixton Creative Enterprise Zone, supporting the objectives of Local Plan Policy HC5 and PN3 (E).	R0092	Green Group Councillors
Retail space should be retained in Brixton to prevent reliance on unsustainable out-of-town retail parks.	Disagree. Retail parks are not protected by London Plan or Local Plan Policy. London Plan Policy H1 B and SD7 supports the mixed-use redevelopment of car parks and low-density retail parks and supermarkets.	R0092	Green Group Councillors
Add text on 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).	Change not accepted. Local Plan Policy H2 requires affordable housing to be provided through the threshold approach set out in London Plan Policy H5. This differentiates between a Fast Track Route (FTR), where an application must provide the threshold level of affordable housing and meet other eligibility requirements; and a Viability Tested Route, where the FTR eligibility requirements are not met.	R0287	JLL on behalf of LPPI Real Estate Fund
Increase unit range to 200 - 250 self-contained residential units (gross).	Change not accepted. The indicative quantum included in the draft allocation are approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. Detailed planning assessment of design proposals at pre-application and planning application stage may also result in a variation on the indicative figures included in the draft site allocation policy.	R0287	JLL on behalf of LPPI Real Estate Fund
Strongly opposed to an arbitrary height limit. Amend wording to "General building height 14m".	Change not accepted. The heights across the site are largely limited by designated local views that are set out in Policy Q25 of the Lambeth Local Plan. Any scheme coming forward would have to show that the views were not harmed (in line with the guidance in the draft Lambeth Local Views SPD 2020).	R0287	JLL on behalf of LPPI Real Estate Fund

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Heights should be subject to further design development and testing in respect to townscape views, local views and relationship to Fitch Court. Failure to remove this arbitrary restriction could render the site allocation unviable and ultimately undeliverable. Future redevelopment of Fitch Court and other land to the south would likely propose an increase in building height along the Effra Road frontage.			
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, i.e. through viability assessment.	Noted. Local Plan Policy H2 requires affordable housing to be provided through the threshold approach set out in London Plan Policy H5. This differentiates between a Fast Track Route (FTR), where an application must provide the threshold level of affordable housing and meet other eligibility requirements; and a Viability Tested Route, where the FTR eligibility requirements are not met.	R0287	JLL on behalf of LPPI Real Estate Fund
Proposals are too high.	Noted. The Site Allocation policy sets out the parameters for development of the site, based on high-level testing of the optimum development capacity that could in principle be accommodated on the site. This was undertaken using a design-led approach in accordance with London Plan Policies D1B(3) and D3. The indicative capacity has been assessed with regards to the site's constraints, ensuring that the indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban/urban locations. Detailed proposals will be assessed against all relevant development plan policies at the time an application is submitted.	R0182 R0213 R0289	Thomas Dimsdale Jessica Matthew Daisy/Rupert Gray

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Applicants and their architects will need to undertake a further assessment of site capacity when designing detailed proposals for submission as a planning application, informed by the parameters set out in the site allocation policies and other relevant policies in the development plan.		
Proposals are out of scale / character with surrounding context.	<p>The character of the site's wider context is considered in detail in Section 2 of the Design Evidence paper for Site 20. This recognises the varied character of the surrounding area, with 2-3 storey terraces along Dahlberg Road and Masey Mews adjacent to the site, alongside a range of medium rise blocks of flats to the west of the site along Effra Road, mostly between 4-9 storeys in height.</p> <p>Heights are restricted by local views constraints and are expected to 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. The approach to building design, views and townscape is considered justified in this context, while considering the high accessibility of the site and its proximity to the town centre. The design evidence includes townscape and visual impact assessments from the nearby conservation areas. The reinstatement of the historic building line, removal of existing car parking, and incorporation of high-quality architecture along Effra Road will have beneficial effects to the character of this part of Brixton.</p> <p>The indicative approach is a tool to assess site capacity and not a detailed proposal. A detailed design prepared by the applicant and their architects at application stage would need to demonstrate compliance with London Plan and Local Plan design policies, which include policies which seek to protect and enhance character, heritage and townscape.</p>	R0079 R0182 R0213	Brixton Society Thomas Dimsdale Jessica Matthew
Support increase in density.	Support noted.	R0024	Matthew Pencharz
Support acknowledgement of bore hole and recommendation to consider risks to groundwater sources associated with construction.	Support noted.	R0282	Environment Agency
Concerns regarding noise on neighbour amenity.	The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any development would be required to	R0028 R0289	Deborah Fenney Daisy / Rupert Gray

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	protect local amenity in accordance with Local Plan Policy Q2, ensuring adverse impact of noise are reduced to an acceptable level through the use of attenuation, distance, screening, or layout/orientation. The impact of any demolition and construction will be considered at the time a planning application is submitted. Applicants will be required to submit a Construction Management Plan (in accordance with London Plan Policy T7 'Deliveries, servicing and construction' and Local Plan Policy T7 'Servicing') to set out measures to manage and mitigate the impacts of development. Where relevant, the cumulative impacts of other development within the site vicinity will be considered as part of any planning application coming forward, as required by Local Plan Policy T7.No change required.		
Concerns regarding loss of daylight / sunlight to neighbouring streets.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards' which protect against unacceptable impact on levels of amenity, including any effect on daylight and sunlight. Applicants will have to show how they have responded to sensitive neighbours in an acceptable manner. No change required.	R0027 R0028 R0289	Jan Brasching Deborah Fenney Daisy / Rupert Gray
Concerns regarding overlooking / privacy to neighbouring residents.	The indicative approach has been informed by site constraint analysis to ensure that indicative mass, height and separation distances to sensitive receptors are generally consistent with what is likely to be acceptable for inner urban / urban locations. The 'Neighbour relationships' part of the site allocation policy requires a design which would not cause unacceptable impacts on existing neighbours adjacent to the site. Any proposed development that comes forward would be required to demonstrate through a planning application an acceptable response to privacy as required by relevant London Plan policies (D3 'Optimising site capacity through the design-led approach' and D6 'Housing quality and standards') and the Lambeth Local Plan (policy Q2 'Amenity' and H5 'Housing standards'). Policy Q2 requires new	R0027 R0028 R0183	Jan Brasching Deborah Fenney Jessica Beck

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	development to provide adequate outlooks, avoiding wherever possible any undue sense of enclosure or unacceptable levels of overlooking (or perceived overlooking). No change required.		
Opportunity for green enhancements / significant biodiversity net gain.	Noted. London Plan Policy G6 and Local Plan Policy EN1 seek to protect, enhance, create and/or manage nature conservation and biodiversity interest in accordance with the borough's Biodiversity Action Plan (BAP) and the Mayor's Biodiversity Strategy. Local Plan Policy EN1 D requires major development in areas of open space deficiency and/ or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. London Plan Urban Greening Factor (PolicyG5) requirements will apply. In addition, the new Biodiversity Net Gain requirements in the Environment Act 2021 will apply to any future planning application at this site. This will require new development to achieve a 10% net gain in biodiversity. No change required.	R0027 R0092	Jan Brasching Green Group Councillors
Car park should be removed.	Noted. The site allocation does not support the reprovision of the existing retail parking.	R0014	Transport for London
Development should be car-free, with restricted vehicle access for disabled persons' parking and servicing only	Agree to provide further clarification to this part of the Site Allocation. PROPOSED CHANGE p.90 'Transport, movement and public realm' section. Amend first paragraph to read: "Local Plan and London Plan transport policies will apply, <u>therefore the development is expected to be car free with vehicle access restricted to disabled persons' parking and servicing.</u> "	R0014	Transport for London
Any use linked to sustainable last mile distribution/logistics or 'just-in-time' servicing should use cargo bikes and minimise the need for vehicle access.	Agree to provide further clarification to this part of the Site Allocation. PROPOSED CHANGE p.90 'Transport, movement and public realm' section. Amend sixth paragraph to read: "A suitable off-street servicing strategy for both the light industrial and residential uses should be demonstrated. <u>Where land use is linked to last mile distribution/logistics or 'just-in-time', servicing which utilises cargo bikes and minimise the need for vehicle access will be supported.</u> "	R0014	Transport for London
Do not envisage infrastructure concerns regarding wastewater	Noted.	R0022	Thames Water

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
networks in relation to this development.			
Scale of development likely to require upgrades of the water supply network infrastructure. Applicant to notify Thames Water ahead of development.	Noted. Developers will need to liaise with Thames Water when drawing up development proposals to ensure water supply and wastewater networks can support a scheme.	R0022	Thames Water

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

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
The process of preparing and adopting the SADPD should have moved faster.	<p>The process of preparing and adopting the SADPD is regulated in the Town and Country Planning (Local Planning) (England) Regulations 2012. This includes two rounds of public engagement, a consultation pursuant to Regulation 18 of those regulations, and a representations procedure on the legal compliance and 'soundness' of the Development Plan Document pursuant to Regulation 19.</p> <p>Representations received during the Regulation 18 consultation informed the content of the proposed submission version of the SADPD. The preparation of the SADPD as moved as fast as possible given the complexity of the proposals, the scale of the response to the first round of public engagement and the changes required as a result.</p>	R0271	Loughborough Junction Action Group (LJAG)
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.	<p>Change not accepted. Supporting text to Local Plan policy H13 on large-scale purpose-built shared living states that proposals for this type of accommodation should not compromise the delivery of self-contained housing to meet Lambeth's London Plan housing target.</p> <p>The principal objective of the SADPD is to unlock investment to provide benefits to local residents through the mechanism of site-specific planning policy. The site allocation policies are seen as a way to accelerate delivery of conventional housing in the borough, maintain the necessary pipeline of new housing and thereby ensure housing delivery targets continue to be achieved. With this objective in mind, it is considered that Site 22 should be allocated for housing.</p>	R0063	Maddox Planning on behalf of Hardess Yard Ltd
The current planning application for shared living accommodation should be refused on the basis that it is inconsistent with the emerging policy in the SADPD and that the scheme as currently proposed will not address housing need in Lambeth	<p>Consideration of this application is beyond the remit of the SADPD. The weight that can be applied to the SADPD for decision making purposes will increase as the SADPD progresses through the plan's production. The weight will increase once the SADPD is submitted for examination.</p>	R0256	Helen Hayes MP

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Support for the replacement of existing industrial uses on the site and the provision of a mixed used development.	Support noted.	R0271	Loughborough Junction Action Group (LJAG)
Proposed building heights are excessive for the context.	The views testing in the design evidence document has concluded that the allocation will contribute to a new, emerging context, along with the recently completed Higgs Scheme and Allocation Site 23. The area is changing. The allocation will help manage change in a positive way.	R0079 R0092 R0185 R0271	Brixton Society Green Group Councillors Andrew Makower Loughborough Junction Action Group (LJAG)
Adverse impact on the setting of the Loughborough Park Conservation Area.	The Indicative approach has tested views from the Loughborough Park Conservation Area (views 5, 6, 7 and 8), taking into account the visibility of the recently completed Higgs Yard scheme. The conclusion of that assessment is that no harm will result to the significance (including setting of the Loughborough Park CA). It is considered that the Higg's yard scheme illustrates how well-designed new development visible in the setting of heritage assets can be harmonious.	R0079 R0185 R0271	Brixton Society Andrew Makower Loughborough Junction Action Group (LJAG)
Detriment of residents' standards of amenity due to housing and employment uses being squeezed together in a restricted site.	Matters of amenity will receive the fullest consideration at application stage against the amenity policies in the Development Plan, particularly Local Plan policy Q2.	R0079	Brixton Society
Constraints on business operations and access due to housing and employment uses being squeezed together in a restricted site.	Servicing and user interactions at street level will be key consideration for designers working up any future proposals. Any proposal coming forward will be tested against relevant Development Plan policies.	R0079	Brixton Society
The SADPD vision does not recognise the opportunity to create a	The Development Plan has a range of design policies that will be used to assess any scheme coming forward and to ensure it is of the highest quality. It was not considered necessary here to replicate those policy objectives.	R0271	Loughborough Junction Action Group (LJAG)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
development of architectural significance for the area.			
Issues of mutual overshadowing and overlooking between proposed development and implemented scheme on Higgs Yards.	The separation distance between this site allocation and the completed Higgs scheme, when roadways on either side of the viaduct are taken into account, will be c45m which is considered very generous. The amenity impacts of any future application will be tested against the Development Plan policies, particularly Local Plan policy Q2.	R0079	Brixton Society
There appears to be no evidence behind the reduction in maximum height between the Regulation 18 version of the allocation and the Regulation 19 Proposed Submission Version.	The revised approach follows greater refinement of bulk and mass in relation to daylight and sunlight testing and neighbour impacts and in direct response to representations received at Regulation 18. When comparing the Regulation 18 and Regulation 19 responses it is considered that the latter is more refined and more responsive to context than the former.	R0063	Maddox Planning on behalf of Hardess Yard Ltd
Reduction in the proposed density of development is welcome.	Noted.	R0256	Helen Hayes MP
Reduction in number of homes proposed should be reviewed to reflect London Plan and Borough strategies to increase social housing supply.	<p>Any quantum of affordable housing proposed as part of any future planning applications affecting Site 22 will be assessed against London Plan policies H4, H5 and H6 and Lambeth Local Plan policies H2 and H4. The standard London Plan threshold approach known as Fast Track Route will apply for applications that provide a threshold level of affordable housing and meet the other relevant criteria. Alternatively, the Viability Tested Route will apply for applications that do not secure the mentioned thresholds.</p> <p>If the Fast Track Route is followed, at least 35 per cent of all residential units proposed as part of any planning application will be affordable residential units, including low-cost and intermediate products. Where development occurs on publicly owned land, this percentage will increase to 50 per cent of all residential units proposed. As per the London Plan, under this route the minimum requirement for affordable housing within a site is proportional to total number of units proposed.</p> <p>As per London Plan 2021 Policy H5 F, when an application does not meet the criteria to follow the Fast Track Route (i.e., it does not propose at least 50 per cent affordable housing on public land, or 35 per cent affordable housing on private land) it must follow the Viability Tested Route. This would require the</p>	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	applicant to submit supporting viability evidence in the form of a viability assessment that will determine the maximum level of affordable housing deliverable on the scheme.		
Support for the proposed route through from Herne Hill Road to Hinton Road following the line of the railway viaduct.	Support noted.	R0271	Loughborough Junction Action Group (LJAG)
The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure.	Developers will need to liaise with Thames Water. No change required.	R0022	Thames Water
Sacrificing the last opportunity to safeguard a long-overdue access to the London Overground railway service.	This falls outside the remit of the SADPD. Previous feasibility studies have looked at possible locations for a new Overground Station and the council will continue working in partnership with TfL and Network Rail to bring forward improvements to public transport infrastructure including interchanges at Brixton.	R0079	Brixton Society
Current public transport infrastructure is not capable nor suitable to accommodate a greater number of users.	The level of growth anticipated in the SADPD is supported by an Infrastructure Delivery Plan and the Community Infrastructure Levy (CIL) Charging Schedule 2022. CIL will be used to contribute towards delivery of necessary supporting infrastructure, including transport infrastructure. In addition, site specific mitigation will be secured through section 106 planning obligations in accordance with the policies in the Local Plan 2021. The supporting text to Local Plan policy PN10 Loughborough Junction acknowledges that rail services are overcrowded at peak times and passenger numbers at the station are increasing. The station itself does not provide step-free access and generally requires refurbishment. CIL and S106 contributions raised as part of the planning process for any detailed schemes proposed for Site 22 will help fund any upgrade works required to the existing transport infrastructure.	R0256	Helen Hayes MP
SADPD policy wording regarding Transport, movement and public realm should be explicit in ensuring	Any future application for the development of Site 22 will be accompanied by a Transport Assessment. This assessment will include a trip generation analysis and an assessment of the expected impacts on the local road and public transport networks.	R0092	Green Group Councillors

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
road safety in the vicinity of Herne Hill Road.			
The council should maximise public transport benefits to be secured through any future planning application.	In accordance with the Community Infrastructure Levy (CIL) Charging Schedule 2022 CIL will be used to contribute towards delivery of necessary supporting infrastructure, including public transport infrastructure. In addition, site specific mitigation will be secured through section 106 planning obligations in accordance with the policies in the Local Plan 2021. It was not considered necessary to replicate the content of those policies here.	R0256	Helen Hayes MP

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

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Sites should have been selected and proposals prepared in collaboration with local communities.	<p>The principal objective of the SADPD is to unlock investment on sites through the mechanism of site-specific planning policy. The Site Selection Evidence Paper, which is published in the Examination library with the reference EB 01, provides further detail on how the sites were selected. This document was consulted on as part of the Regulation 19 representations procedure.</p> <p>Sites were originally selected for one or more of the following reasons:</p> <ul style="list-style-type: none"> - 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 place-making objectives, where they might otherwise be uncertain about what would be supported. - To signal some additional sites as appropriate for tall buildings, outside the locations already identified in the LLP. - To enable key strategic infrastructure to come forward in a timely way. <p>The SADPD preparation process has followed two stages of community engagement - Regulation 18 consultation on the Draft SADPD and Regulation 19 representations procedure on the SADPD PSV. Both community engagement processes were in line with Lambeth Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012 and provided the opportunity for local communities to have their say on the site allocations.</p>	R0031	Matthew Clarke

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Lack of thorough and well publicised public consultation.	<p>Consultation of the SADPD was carried out in line the Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of Lambeth's Statement of Community Involvement. In accordance with Regulation 18(1)(a), general and specific consultation bodies, residents and other persons carrying out business in the borough that may be affected by the proposals in the SADPD were invited to make representations. An engagement plan was put together at the outset of the project with the aim of broadening participation in line with Lambeth's SCI. As part of this plan, a stakeholder mapping exercise was carried out which identified three categories of stakeholders according to their level of engagement; 'active', 'aware and potentially active' and 'groups with whom the Council had struggled to engage in the past'. In order to reach all of these groups, the engagement plan comprised a range of specifically designed engagement and publicity methods, including engagement with elected politicians, online area-based meetings with representatives from community groups and organisations based in the neighbourhoods in which the Council proposed a site allocation, dedicated virtual presentations to other organisations operating in the borough, and workshops with young people. Publicity and dissemination methods used at Regulation 18 consultation stage comprised notification emails, social media posts on several platforms, and online articles and entries in digital newsletters and e-bulletins.</p> <p>Similarly, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council notified all those general consultation bodies and specific consultation bodies invited to make representations under Regulation 18 of the SADPD PSV being made available for inspection and invited them to make representations under Regulation 19/20. This notification was also intended to those who had submitted representations as part of the Regulation 18 consultation. Engagement methods used during this round of consultation included several meetings with ward councillors and Members of Parliament and online area briefings with representatives from community groups and organisations. Beyond the email notification the Council sought to broaden the range of stakeholders involved by using other publicity and dissemination methods such as social media posts and online articles, which were published on Lambeth-wide e-bulletins.</p>	R0031	Matthew Clarke

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	Further detail on the consultation process, the stakeholder mapping and engagement methods used for the two stages of the consultation on the SADPD are included in the Regulation 22 Consultation Statement, available as part of the Examination library (Ref. SD 10).		
Support for the mixed-use redevelopment of the site.	Support noted.	R0271	Loughborough Junction Action Group (LJAG)
Provision of retail shops at ground level is welcomed.	Support noted.	R0031	Matthew Clarke
An economic investigation into which uses could achieve the animation of the street frontage.	Detailed proposals submitted by applicants will be assessed to determine whether they provide the active frontages at ground floor level the site allocation policy refers to. It is considered that a combination of community use and flexible town centre use or uses could achieve the desired animation of the street frontage. Main town centre uses as defined by London Plan 2021 comprise retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). Not all these town centre uses would be adequate for this location, however, they give an indication of what type of uses would achieve the desired outcome.	R0271	Loughborough Junction Action Group (LJAG)
Ambition for servicing or yard space mentioned in the last paragraph of Land Uses (p.154) is unrealistic and should be deleted.	Disagree. This paragraph requires applicants to 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 and explain the outcome of that consideration. The paragraph therefore does not require these uses to be provided but highlights they should be considered.	R0079	Brixton Society
Opposition to the church use occupying the whole of the ground floor unless it contributes to the appearance and animation of the town centre	The indicative approach anticipates a church foyer space at ground floor with the worship area on the floor above.	R0271	Loughborough Junction Action Group (LJAG)

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Reservations on how a religious floorspace between retail units and with housing above would operate.	The indicative approach anticipates a church foyer space at ground floor with the worship area on the floor above.	R0031	Matthew Clarke
There should be greater emphasis placed on good design.	Any application would be subject to the range of design policies in the Development Plan and expected to be of the highest quality. It is not felt necessary to replicate their requirements here.	R0271	Loughborough Junction Action Group (LJAG)
Proposed building heights are excessive for the context.	The views testing in the design evidence document has concluded that the allocation will contribute to a new, emerging context, along with the recently completed Higgs Scheme and Allocation Site 23. The area is changing. The allocation will help manage change in a positive way.	R0031 R0079 R0185 R0271	Matthew Clarke Brixton Society Andrew Makower Loughborough Junction Action Group (LJAG)
Issues of mutual overshadowing and overlooking between proposed development and implemented scheme on Higgs Yards.	Development and testing of the 'Indicative Approach' model in the Site 23 design evidence included daylight and sunlight impacts and neighbour relationships (including the neighbouring Higgs Scheme when it was approved). Figures 12 and 13 in the design evidence show how the Higgs approval has dictated the basic form of the Indicative Approach. The approved mass was also considered. It is acknowledged that the relationship with Higgs needs to be handled with care. Any application coming forward would be tested against the relevant amenity policies in the Development Plan.	R0079	Brixton Society
The SADPD vision does not recognise the opportunity to create a development of architectural significance for the area.	Any application coming forward would be tested against the wide range of design policies in the Development Plan and adopted guidance and expected to be of the highest quality. It is not considered necessary to replicate their requirements here.	R0271	Loughborough Junction Action Group (LJAG)
Adverse impact on the setting of the Loughborough Park Conservation Area, particularly views from Ruskin Park.	Loughborough Park Conservation Area At its nearest point, the Loughborough Park CA is 160m away to the Southwest. Coldharbour Lane bends and the two are separated by railway viaducts and built development. No views out of the conservation area align with Site 23. It is considered that development of Site 23 to the heights identified in the	R0185	Andrew Makower

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>allocation (not suitable for a tall building) will have no effect on the significance of the Loughborough Park CA.</p> <p>Ruskin Park</p> <p>At the height identified in the Design Evidence (indicative approach 33m) testing from Ruskin Park was not considered necessary.</p> <p>However, View 9 (page 42) in the design Evidence for Site 23 is from Ruskin Park in the direction of Site 23. It shows the adjoining Higgs Scheme (56.7m). In that view, Site 23 would stand immediately to the right of Higgs (they are immediate neighbours). A scheme to the max height allowable under the Site Allocation (up to 45m) would be around 12m lower than the visible Higgs scheme. Officers consider that it would appear as subordinate to the existing Higgs scheme, forming a group with it, and would not be harmful. Officers are comfortable that no harm would result to the (including setting) significance of Ruskin Park.</p>		
Provision of a widened pavement is welcomed.	Support noted.	R0031 R0079 R0271	Matthew Clarke Brixton Society Loughborough Junction Action Group (LJAG)
Additional greenery is required to address the deficiency in public green space.	The limited footprint of the site did not make such an approach possible. However, the Allocation and the indicative approach seem an improvement to the footpath along Coldharbour Lane.	R0271	Loughborough Junction Action Group (LJAG)
Development proposals have not been future proofed for climate change.	There is considerable existing development plan policy and guidance in London and Lambeth dealing with all aspects of climate change mitigation and adaptation. All existing and emerging policy, guidance and regulations will be applied to proposals coming forward on the site allocation sites, in addition to the site allocation policies themselves. The site allocation policies also make clear that development coming	R0031	Matthew Clarke

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	forward on those sites should be exemplary in meeting the zero carbon requirements of development plan policy.		
The vision for the site needs to address air quality, and how the development could contribute to its improvement.	As stated in the Air Quality section of the Site Allocation Policy for Site 23, air quality should be addressed in accordance with London Plan Policy SI1 and Lambeth's Air Quality Action Plan. It is not considered necessary to replicate this text as part of the Vision for the site.	R0271	Loughborough Junction Action Group (LJAG)
Support for the proposed route through following the line of the railway viaduct.	Support noted.	R0271	Loughborough Junction Action Group (LJAG)
Current public transport infrastructure is not capable nor suitable to accommodate a greater number of users.	Any future application for the development of Site 23 will be accompanied by a Transport Assessment. This assessment will include a trip generation analysis and an assessment of the expected impacts on the local road and public transport networks.	R0256	Helen Hayes MP
The council should maximise public transport benefits to be secured through any future planning application.	In accordance with the Community Infrastructure Levy (CIL) Charging Schedule 2022 CIL will be used to contribute towards delivery of necessary supporting infrastructure, including public transport infrastructure. In addition, site specific mitigation will be secured through section 106 planning obligations in accordance with the policies in the Local Plan 2021. It was not considered necessary to replicate the content of those policies here.	R0256	Helen Hayes MP

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

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
Lack of thorough and well publicised public consultation.	<p>Consultation of the SADPD was carried out in line the Town and Country Planning (Local Planning) (England) Regulations 2012 and the requirements of Lambeth's Statement of Community Involvement. In accordance with Regulation 18(1)(a), general and specific consultation bodies, residents and other persons carrying out business in the borough that may be affected by the proposals in the SADPD were invited to make representations. An engagement plan was put together at the outset of the project with the aim of broadening participation in line with Lambeth's SCI. As part of this plan, a stakeholder mapping exercise was carried out which identified three categories of stakeholders according to their level of engagement; 'active', 'aware and potentially active' and 'groups with whom the Council had struggled to engage in the past'. In order to reach all of these groups, the engagement plan comprised a range of specifically designed engagement and publicity methods, including engagement with elected politicians, online area-based meetings with representatives from community groups and organisations based in the neighbourhoods in which the Council proposed a site allocation, dedicated virtual presentations to other organisations operating in the borough, and workshops with young people. Publicity and dissemination methods used at Regulation 18 consultation stage comprised notification emails, social media posts on several platforms, and online articles and entries in digital newsletters and e-bulletins.</p> <p>Similarly, in line with the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council notified all those general consultation bodies and specific consultation bodies invited to make representations under Regulation 18 of the SADPD PSV being made available for inspection and invited them to make representations under Regulation 19/20. This notification was also intended to those who had submitted representations as part of the Regulation 18 consultation. Engagement methods used during this round of consultation included several meetings with ward councillors and Members of Parliament and online area briefings with representatives from community groups and organisations. Beyond the email notification the Council sought to broaden the range of stakeholders involved by using</p>	R0122	Ra Anderson

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
	<p>other publicity and dissemination methods such as social media posts and online articles, which were published on Lambeth-wide e-bulletins.</p> <p>Further detail on the consultation process, the stakeholder mapping and engagement methods used for the two stages of the consultation on the SADPD are included in the Regulation 22 Consultation Statement, available as part of the Examination library (Ref. SD 10).</p>		
Adverse impact on the setting of the Loughborough Park Conservation Area, particularly views from Ruskin Park.	<p>At its nearest point the Loughborough Park Conservation Area is situated some 770m Southwest of Site 24. The existing tall buildings on Site 24 are not visible from the Loughborough Park CA. The two are separated by central Loughborough Junction which includes the recently completed Higgs development and the Site 22. Given the above, it is considered that development on Site 24 will have no effect on the significance (inc. setting) of the Loughborough Park CA. The design evidence for Site 22 gives some indication of the visibility of that site from the CA; the hospital is some 390m further away.</p> <p>The effect on the setting of Ruskin Park is explored in the Design Evidence – with five of the townscape views assessed (nos. 8, 9, 10, 11 and 12) looking across the Park towards the Hospital. The current appearance is poor; redevelopment has the potential to improve the setting of the park by presenting attractive modern buildings in the backdrop.</p>	R0185	Andrew Makower
The proposal ignores the need for green spaces in an area of the borough that suffers from limited access to open spaces and air pollution.	Part D of Local Plan policy EN1 on Open space, green infrastructure and biodiversity requires any future major development in areas of open space deficiency and/or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. As Site 24 is located within an area of open space deficiency at several categories (local, small & pocket, district and metropolitan) this policy will apply to any major planning application put forward for the site. It is therefore not considered necessary to replicate this policy wording as part of the allocation policy for Site 24.	R0122	Ra Anderson
The level of information contained in this document does not enable Thames Water to make an assessment of the impact the	This information is not yet available and will depend on development proposals to be brought forward at a later date. Developers will need to liaise with Thames Water at that time to enable an appropriate response to be given. No change required.	R0022	Thames Water

Main issue raised	Council response	Respondent ref. no.	Name/Organisation
proposed site allocations will have on the clean water infrastructure.			
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 wastewater network infrastructure and sewage treatment works.	This information is not yet available and will depend on development proposals to be brought forward at a later date. Developers will need to liaise with Thames Water at that time to enable an appropriate response to be given. No change required.	R0022	Thames Water
Redevelopment will negatively impact traffic and parking in the area.	Any future application for the development of Site 24 will be accompanied by a Transport Assessment. This assessment will include a trip generation analysis and an assessment of the expected impacts on the local road and public transport networks. The Transport Assessment will also be required to include a parking assessment incorporating parking surveys and an analysis of the parking impacts of the development. If necessary, additional parking controls such as the introduction of a Controlled Parking Zone (CPZ) may be secured in mitigation for the development, to be funded by the developer. In line with London Plan policy T6, the development will be car-free and permit free, meaning that businesses on the site would not be entitled to parking permits to park on-street if CPZ is introduced. The number of vehicular trips generated by development on site will therefore be limited, helping to minimise impacts on parking, congestion and air quality in the area.	R0122	Ra Anderson