

London Borough of Lambeth

Lambeth Local Plan Proposed Submission  
Topic Paper 1 – Housing

November 2013

**1. Purpose of the topic paper**

- 1.1 This topic paper sets out the detailed justification and analysis of supporting evidence for the policies in the housing section of the Lambeth Local Plan Proposed Submission. It describes the alternative policy approaches considered and the reasons for the chosen approach, in light of the supporting evidence and comments received on the Draft Lambeth Local Plan in March to April 2013. This paper also explains how the Local Plan Proposed Submission addresses the requirements of the National Planning Policy Framework 2012 (NPPF), as these apply to housing.

**2. Maximising housing growth (Policies H1, H3)**

- 2.1 To boost significantly the supply of housing, the NPPF states that local planning authorities should, amongst other things, use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.
- 2.2 There is significant and pressing need and demand for new housing in Lambeth, evidenced by the 2012 Lambeth Housing Needs Assessment (HNA). With reference to the objectives set out in Lambeth's Housing Strategy 2012-16, the council will make full use of the borough's capacity for housing, promoting and supporting Lambeth as a place of housing growth.
- 2.3 The London Plan 2011 requires at least 11,950 net additional dwellings in Lambeth over the period 2011-21, with an annual target of 1,195. The council will, through policies in the Local Plan, seek to meet and exceed this target. This is supported by evidence of the supply of land for housing in the borough and regular monitoring of housing completions. The Lambeth Housing Implementation Strategy (February 2013) sets out the expected rate of housing delivery in Lambeth through a housing trajectory and demonstrates the five-year supply of housing land to meet the London Plan housing target.
- 2.4 The GLA has stated that it will issue Further Alterations to the London Plan 2011 early in 2014 and that this will include new London-wide and borough-level housing targets. These targets are expected to be significantly higher, in response to recently revised demographic projections and the on-going problem of unmet housing supply. The council has been working with the GLA on the evidence base for the emerging new borough-level housing target for Lambeth. However, the new target will not be finally agreed until adoption of the Further Alterations to the London Plan 2011 in 2015.
- 2.5 To address the implications of the new target once adopted (including any requirements for additional supporting infrastructure), the council proposes to undertake an immediate partial review of the Lambeth Local Plan after

its adoption in 2015. Analysis of the issues, and options for addressing them, will start as soon as the proposed new target is made known later in 2013.

- 2.6 In order to update the evidence base for the Further Alterations to the London Plan and to comply with the requirements of the NPPF, the GLA is producing a new Strategic Housing Market Assessment (SHMA), which will provide estimates of London's future housing requirements. To provide evidence of future housing capacity the GLA is also currently undertaking a new Strategic Housing Land Availability Assessment (SHLAA) in partnership with the London boroughs. The London SHMA and SHLAA are expected to be published in January 2014, alongside the Further Alterations.
- 2.7 The London SHMA will provide estimates of London's future housing requirements at London-level only, with boroughs advised to continue with sub-regional or local SHMAs as appropriate. An update of the evidence of housing need in Lambeth will therefore be commissioned as soon as the London SHMA is published, to ensure that it is up to date in relation to new population projections and unconstrained by the existing housing target. This will ensure consistency in the evidence and compliance with the requirements of the NPPF, in order to inform the early review of the Lambeth Local Plan in 2015.

### **3. Delivering the homes Lambeth needs (Policies H2, H4, H6-H10)**

- 3.1 The successful delivery of new homes is not just about increasing the number of units built. It is also about ensuring growth contributes positively to the creation of mixed, inclusive and sustainable communities and delivers high-quality, well-designed homes and neighbourhoods. A range of housing in terms of dwelling size, type and affordability is central to achieving mixed communities, and ensuring areas are attractive to people of different ages, lifestyles and incomes. Neighbourhoods must also be supported by accessible local services that reflect the needs of existing and future populations, support the health, social and cultural well-being of communities, and facilitate social interaction. The policies in the Local Plan seek to ensure that both small and large-scale residential development contributes to the creation of communities that are mixed and balanced by tenure and household income, promote social diversity, equality and inclusion, and foster a sense of community and neighbourhood identity. The policies and associated housing design standards also promote the delivery of high-quality, sustainable homes that meet the needs of those who will live in them.
- 3.2 To deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, the NPPF states that local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community;
  - identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
  - where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 3.3 Underpinned by local evidence, the Local Plan seeks to deliver a wide choice of high-quality homes meeting the range of local housing needs. This is expanded upon below.

#### **Affordable housing (Policy H2)**

- 3.4 While all tenures will make an important contribution to meeting housing need, the council is committed to maximising the delivery of affordable housing wherever possible. There is an urgent need for more affordable housing in Lambeth, especially for families. Lambeth's Housing Strategy identifies maximising the delivery of affordable housing as a key priority.
- 3.5 The local Housing Needs Assessment 2012 (HNA) identifies an overall housing requirement across all tenures of 23,900 homes, to 2031. Of this, 70 per cent is a need for affordable housing.
- 3.6 Through the Lambeth Core Strategy 2011 (and prior to that the Lambeth Unitary Development Plan 2007) the council seeks 50 per cent affordable housing where public subsidy is available, or 40 per cent without public subsidy, subject to viability. The policy applies to sites 0.1ha or greater in size and to sites capable of accommodating 10 or more homes. This policy has been effective in delivering affordable housing in the borough (ref. Lambeth Housing Development Pipeline Reports and Housing Implementation Strategy 2013). Alternative policy approaches, including revising the target and/or varying the percentage sought in different parts of the borough, were considered. However, recognising that the scale of housing need in Lambeth is high and is projected to grow (as evidenced by the Lambeth HNA), the current target has been retained in the Lambeth Local Plan Proposed Submission. This approach was supported by the findings of the viability assessment undertaken by BNP Paribas Real Estate, discussed below, and the Sustainability Appraisal.

- 3.7 The policy was tested and supported by an assessment of the viability impacts of the emerging affordable housing planning policy requirements and an assessment of the cumulative impact of policy requirements and proposed CIL rates. The assessments were undertaken by BNP Paribas Real Estate and the results published in two reports: 'Affordable Housing Policy – Viability and Strategy Assessment 2013' (February 2013) and; 'Draft Lambeth Local Plan 2013 – Viability (February 2013)'.
- 3.8 In the context of finite development value, council is seeking to strike an appropriate balance between securing the maximum possible contribution towards affordable housing, whilst also securing contributions towards infrastructure that will be essential for growth. The 'Draft Lambeth Local Plan 2013 – Viability Study' tested the ability of sites to absorb the emerging policy requirements, including CIL, S106 obligations and affordable housing. This assessment of the cumulative impact of the council's requirements was undertaken in line with the requirements of the NPPF and the Local Housing Delivery Group guidance 'Viability Testing Local Plans: Advice for planning practitioners' (June 2012).
- 3.9 The study demonstrates that in many cases schemes can accommodate the affordable housing requirement at a level somewhere between 20 per cent and 40 per cent without grant. While, when the cumulative effect of affordable housing and CIL was tested on developments some schemes were able to accommodate less affordable housing in certain scenarios that were tested, the viability study confirmed that the council's flexible approach to application of its affordable housing targets will ensure the viability of developments is not adversely affected over the economic cycle. Given the nature of CIL as a fixed tariff, the level of affordable housing will reduce to accommodate infrastructure requirements in some cases.
- 3.10 Viability testing is central to the policy. Policy H2 seeks to secure the maximum reasonable proportion of affordable housing from sites, without compromising development viability. Policy H2 acknowledges that site-specific circumstances may arise and sets out the council's approach of seeking a detailed and robust financial statement where affordable housing targets cannot be met.

*Review mechanisms*

- 3.11 The policy includes provisions for re-appraising the viability of schemes where sub-policy levels of affordable housing are provided. This is in order to capture any up-lift in value due to a delayed planning implementation and/or a phased build out of a major scheme, to take account of economic uncertainties, and in respect of schemes presently anticipated to deliver low levels of affordable housing.

*Affordable housing tenure*

- 3.12 The London Plan 2011 sets a strategic target of 60 per cent social rented housing and 40 per cent intermediate housing across London. Within this context, each borough is expected to set its own targets. Borough policies must be in general conformity with the London Plan but variations in the approach can be taken where local authorities have sound evidence that it is justified by local circumstances.
- 3.13 The HNA shows that 96 per cent of total affordable housing need in Lambeth is a requirement for social rented housing, with four per cent a requirement for intermediate affordable housing. Consideration was given to aligning the tenure split with the London Plan. However, on the basis of the findings of the recent Lambeth HNA, whereby social rented accommodation represents a higher proportion of the overall need for affordable housing in Lambeth, the Local Plan Proposed Submission retains the existing (Core Strategy) policy requirement of 70 per cent rented and 30 per cent intermediate affordable housing. Although the HNA indicates a relatively low level of need for intermediate housing, principally because the households these products are aimed at can generally afford to access private rented housing, intermediate housing plays an important role in ensuring mixed communities and providing a greater range of housing options to residents.
- 3.14 In October 2013 the Mayor published for consultation Revised Early Minor Alterations (REMA) to the London Plan. The REMA introduce alterations to the London Plan that reflect changes to national planning policy brought in by the NPPF, and respond to other developments since the plan's publication in 2011, such as the inclusion of the affordable rent product. Among other things, the alterations clarify that the affordable rent product is intended to address the same housing needs as social rented housing and as such, for the purposes of the 60:40 social rent / intermediate split in the 2011 London Plan, both social rent and affordable rent should be included within the 60 per cent. In Lambeth, 70 per cent of new affordable housing units should be homes for social or affordable rent, and 30 per cent intermediate provision.
- 3.15 The affordable rent model will have a key role in delivering the council's objectives to promote housing growth and increase the supply of affordable housing. However, analysis of rental levels across the borough demonstrates that rents set at 80 per cent of market rent will be unaffordable to most households currently eligible for social rented housing in Lambeth. The council is concerned to ensure that rents are genuinely affordable and will work with registered providers towards this objective. The Local Plan Proposed Submission gives priority to the delivery of affordable housing at rental levels that meet the needs of low income households within the borough, consistent with the council's

position statement on affordable rent set out in Lambeth's Tenancy Strategy (July 2012).

- 3.16 The NPPF requires local planning authorities to set policies to meet identified need on-site, *"unless off-site provision or a financial contribution...can be robustly justified"*. The London Plan REMA give clear preference to on-site affordable housing provision, with off-site provision and cash in lieu contributions accepted only in exceptional cases.
- 3.17 In line with the London Plan, Policy H2 in the Local Plan Proposed Submission addresses the sequential approach to seeking affordable housing provision from new development. The policy requires that affordable housing is provided on site; where this cannot be practically achieved, or it would be more effective in meeting needs for affordable housing, off-site affordable accommodation provided by the developer may be accepted; exceptionally, a payment in lieu may be accepted. The revised Section 106 Planning Obligations supplementary planning document will specify how this commuted sum will be calculated.
- 3.18 In developing Policy H2, consideration was given to: (a) requiring affordable housing provision to be delivered only on site; and (b) giving greater flexibility to allow off-site provision to be delivered anywhere in the borough. However, option (a) would deliver a lower proportion of affordable housing on some sites. While option (b) may deliver a higher quantum of units, it has the potential to undermine policy to secure mixed and balanced communities. To address this, the draft policy stated that the site identified for off-site provision should be located within 400 metres of the principal site.
- 3.19 The approach to affordable housing provision is largely retained from the draft Local Plan. While comments received on the draft Local Plan were generally supportive in principle of the sequential approach to affordable housing provision set out, a number of concerns were raised regarding the requirement for sites to be located within 400m of the principal development site – stating that this is too inflexible and would hinder deliverability. After further consideration, the distance requirement for off-site affordable housing provision has been revised from 400 metres to within one mile of the principal site.
- 3.20 The proposed approach is in line with national and London Plan policy, will deliver a higher quantum of affordable housing, and supports the council's objectives of promoting successful mixed and sustainable neighbourhoods.

*Affordable housing contributions from small sites*

- 3.21 The Local Plan Proposed Submission introduces a new affordable housing requirement from small schemes. Given the level of need in the borough,

as demonstrated by Lambeth's HNA, the council wishes to deliver as many affordable homes as possible. Small sites make a significant contribution to housing supply in Lambeth (ref. Lambeth Housing Development Pipeline Reports). The council's 'Affordable Housing Viability Assessment' (October 2009) concluded that "*some smaller schemes on high value sites might be able to make a contribution towards on-site affordable housing*", although recognising that viability is sensitive to many factors.

- 3.22 There are practical difficulties associated with securing affordable housing on site on smaller schemes. However, commuted sums from such developments could make a significant contribution to the provision of affordable housing.
- 3.23 BNP Paribas Real Estate was commissioned by the council to advise on potential approaches to securing payments in lieu of on-site affordable housing on smaller developments (sites of fewer than 10 units). The study evaluates approaches to securing payments in lieu adopted by other authorities and considers how these might be applied in Lambeth. It tests three approaches on a notional development, to consider which one delivers the optimum outcome, and develops an approach for Lambeth that builds on the best aspects of each. The report, 'Approaches to securing payments in lieu of on-site affordable housing' (BNP Paribas Real Estate, March 2013) is published on the council's website.
- 3.24 The approach recommended in the report, and being taken forward by the council, is the use of a model capable of determining both (a) the viable level of affordable housing a scheme can absorb and (b) the payment in lieu that would flow from this level. Where the policy target would make a development unviable, the affordable housing percentage would be adjusted downwards until the scheme becomes viable.
- 3.25 Contributions will, as with those collected for larger development schemes, be used to deliver affordable housing that is necessary for the borough. Seeking a contribution for off-site affordable housing provision is justified by the London Plan (2011) (Policy 3.12; para. 3.77). The approach is also consistent with the requirements set out in the NPPF and CIL Regulations.

#### **Family-sized homes (Policies H4, H6)**

- 3.26 The HNA identifies a shortfall in homes of all sizes across all tenures in Lambeth. Based on absolute numbers, the greatest shortfall is for smaller homes (one and two-bedroom), to meet substantial projected growth in smaller households. However, housing needs must also be considered in the context of relative need, particularly for social rented and affordable rented housing.



3.27 The HNA notes that while there is an identified shortfall in affordable homes of all sizes in terms of meeting the housing needs of priority groups, the shortage relative to supply is likely to be greatest for larger (three-bedroom plus) family homes. The reasons for this are summarised in the report, as follows.

- Most households who require a one-bedroom property are in a relatively low level of need and are generally adequately housed, whereas many who require family-sized accommodation are not adequately housed, often living in very overcrowded conditions.
- Some of the need identified for one-bedroom properties will be met through the private rented sector and for many single people house-shares will provide an adequate alternative to one-bed accommodation.
- The introduction of a benefit cap from April 2013 as part of the government's wider welfare reform measures will further impact on the affordability of accommodation in the private rented sector, with larger households (mainly families with children) predicted to face the most serious difficulties in paying their rent. Initial modelling indicates that private rented sector housing with three or more bedrooms in Lambeth will be unaffordable to people on benefits.
- The model works on the presumption that all of the new housing required will be built; however in reality it is unlikely that the level of affordable completions could be raised sufficiently to meet all identified need over the period of Lambeth's housing strategy or its local plan. Furthermore, the figures derived through the assessment relate to a twenty-year period. The significant requirement for smaller units identified is largely attributed to the projected growth in smaller households over the longer term.

3.28 Taking these factors into account the Local Plan Proposed Submission prioritises future provision towards larger, family-sized accommodation in the short to medium term, to ensure those in most acute need can be housed. This approach is supported by the HNA and the South West London SHMA, which similarly recommends that the production (and preservation) of larger homes should be prioritised, both through investment and planning policy. This is consistent with the priority given to family-sized homes in Lambeth's Housing Strategy and the strategic priority accorded to the provision of affordable family housing in the London Housing Strategy and the London Plan. The London Housing Strategy (2010) sets out a strategic target that 42 per cent of social rented and 16 per cent of intermediate homes should have three bedrooms or more. The revised London Housing Strategy, published for consultation in December 2011, sets a strategic target for 36 per cent of new affordable rented homes to be family-sized.

- 3.29 To ensure new developments deliver homes that meet priority housing need in Lambeth, and to provide certainty to developers as to the council's expectations, the Local Plan Proposed Submission specifies a preferred borough-wide housing mix for social / affordable rented and intermediate housing for developments providing 10 or more units, having regard to the findings of the HNA and other relevant considerations. The preferred mix will be monitored and reviewed over the lifetime of the plan.
- 3.30 The HNA indicates that 46 per cent of demand in the market sector is for properties with three or more bedrooms. Specifying a preferred mix to be sought from private market housing was considered, however there is concern that being overly prescriptive could have a negative impact in terms of housing delivery. The policy therefore seeks a mix of unit sizes, to include family-sized housing, without being prescriptive.
- 3.31 The conversion of houses to flats can have a significant impact on the supply and availability of family housing, the amenity and character of residential neighbourhoods and the ability to achieve and maintain mixed and balanced communities. Approximately 73 per cent of Lambeth's housing stock comprises flats, of which approximately one third were created through conversions. There is a correspondingly small proportion of houses (approximately 26 per cent). To ensure mixed and balanced communities with a choice of family-sized housing, it is necessary to limit further conversions in Lambeth, as set out in Policy H6. This policy approach was tested and found sound through the examination and adoption of Lambeth's Core Strategy. The evidence to support this policy is set out in the Lambeth Residential Conversions Study (Atkins, 2009).

### **Specialist types of housing (Policy H8)**

- 3.32 In addition to conventional self-contained flats and houses there is also a need in Lambeth for more, or improved, housing to meet the specific needs of residents who may otherwise have difficulty finding alternative accommodation. This includes sheltered housing with care support, staffed hostels, residential care homes/nursing homes, extra-care housing and supported housing provision for children, older persons and other client groups.
- 3.33 The limited land supply in London means that new housing developments must be directed at identified local needs. Lambeth's Housing Strategy and associated client group sub-strategies identify the existing and future accommodation needs for specific client groups, strategies / approaches to accommodation provision and current housing and investment priorities.
- 3.34 More older people are choosing to remain in their own homes rather than go into residential care. Yet in Lambeth there are higher than average numbers of people in residential care, suggesting a lack of alternative housing options – for example suitably designed sheltered or extra-care

housing. Lambeth has a substantial quantity of sheltered housing, some of which is below the Decent Homes standard, and much of which requires investment to enable older residents to remain in their homes as their care needs increase. Lambeth's Older People's Housing Strategy (February 2012) highlights a surplus of sheltered housing for social rent, while there is unmet demand for homes for sale or lease. It also identifies a current and projected deficit of extra-care housing across all tenures. The council wishes to ensure that sufficient suitably designed sheltered and extra-care housing is available for older people, across all tenures, and will support proposals for specialist housing that meets identified need.

- 3.35 A lack of suitable independent housing options for other vulnerable groups – including, people with mental health needs, physical and / or sensory impairment, and adults with learning disability – similarly means that more residents need to be placed in residential care homes, some of which are located outside of the borough. The council is working towards reducing the reliance on residential care provision, and seeks to increase the range and quality of supported independent living options, extra-care housing, self-contained supported housing and general needs housing with appropriate adaptations available to residents in Lambeth. There is also an identified need for more wheelchair accessible properties within the general needs stock and including properties suitable for family accommodation.
- 3.36 To ensure specialist housing needs can be met, the Local Plan Proposed Submission protects such accommodation unless it is re-provided or it is demonstrated that there is no longer a need for it. Allowing the loss of specialist types of housing without adequate consideration and justification would likely exacerbate existing shortages.
- 3.37 The NPPF and London Plan (REMA) refer to the need to make appropriate provision for the accommodation of service families, having regard to local need. The Mayor intends to assess the needs of this group as part of the preparation of the new London SHMA, and any additional strategic policies required will be brought forward through a future alteration to the London Plan. Lambeth will take account of the findings of the SHMA and will seek to meet any identified local needs for housing for service families.

### **Student housing (Policy H7)**

- 3.38 The London Plan 2011 recognises the need for student housing and expresses support for its provision. It makes clear, however, that addressing the demand for student accommodation should not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities.

- 3.39 Whilst London as a whole has a recognised need for more purpose-built student accommodation (London Plan 2011), Lambeth’s local evidence base, specifically, the South West London SHMA and Lambeth’s local HNA, highlight a pressing need for family and affordable housing.
- 3.40 Analysis of existing purpose-built student accommodation in Lambeth and the development pipeline is set out in the Student Housing Assessment November 2013 and summarised in the table below. This identifies: 1,573 existing bedspaces in the borough; two schemes currently under construction (providing 1,495 bedspaces), and; five schemes with planning permission (providing 1,085 bedspaces).

Summary of purpose-built student accommodation in Lambeth

	No. of bedspaces <sup>1</sup>
Total existing	1,573
Total pipeline	2,580
Under construction	(1,495)
Schemes with planning permission	(1,085)

- 3.41 There has been a significant increase in student accommodation provision in Lambeth over the past five years. The number of existing student bedspaces in the borough has increased by 84 per cent since 2011 – from 885 bedspaces, to 1,573. This has arisen through the conversion of a building formerly providing hostel accommodation, to 229 student rooms in 2012, and the completion of three new-build developments in 2013/14, which provided a further 489 bedspaces. As can be seen above, the development pipeline remains healthy, with two schemes currently under construction and a further five with planning permission yet to commence construction.
- 3.42 Student housing does not normally attract affordable housing contributions, nor does it specifically address Lambeth’s significant housing need. A principal concern in Lambeth is therefore that student accommodation should not displace opportunities for conventional housing, especially affordable family homes. Its provision must be carefully balanced with demands for other priority uses, including land for permanent housing (and affordable homes) and local employment opportunities. An over-concentration of student accommodation can also be detrimental to residential amenity, undermine policy to secure mixed and balanced communities, and place undue pressure on local infrastructure. To address this, Policy H7 in the Lambeth Local Plan

<sup>1</sup> This is a conservative estimate, taking account of rooms with multiple occupancy only where known.

Proposed Submission clearly sets out the specific circumstances in which proposals for student housing will be acceptable.

- 3.43 The policy seeks to balance the provision of student accommodation with that of conventional housing. Recent levels of non self-contained housing in Lambeth, which is largely student accommodation, have greatly exceeded the expected contribution from non self-contained housing towards the London Plan housing target; a trend which analysis of the pipeline shows is likely to continue. Given the competition for available sites in Lambeth, it is therefore appropriate to manage the supply of student housing to ensure priority for planned jobs and homes, in line with the Local Plan Proposed Submission vision and objectives. This approach is regarded as a reasonable basis for ensuring that the non self-contained component of the overall housing target continues to be met, and that local needs for student housing are adequately fulfilled.
- 3.44 Consideration was given to alternative policy approaches, including the introduction of a 'cap' in areas with high existing concentrations of student bedspaces such that, when reached, any further student housing schemes would not be supported. The council also considered introducing an area-based policy which would have the effect of focussing new student accommodation in specific locations, and restricted it elsewhere in the borough. However, it was not felt that these approaches were justified by a sufficiently robust evidence base at this time, including because there are a number of schemes with extant planning permissions that have not yet been built out.
- 3.45 The council recognises that provision for specialist student accommodation is needed to support the growth of London's higher education institutions and will expect developers to demonstrate that they have engaged with the appropriate organisations to ensure that new developments will meet identified need.

### **Gypsies and Travellers (Policy H10)**

- 3.46 The national 'Planning policy for traveller sites' (PPTS) (March 2012) states that local planning authorities should:
- make their own assessment of need in respect of traveller sites;
  - set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring LPAs;
  - identify and update annually a five year supply of specific deliverable sites against their locally set targets;
  - consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites.

- 3.47 The London Plan 2011 (Policy 3.8) states that boroughs should identify and address the accommodation requirements of gypsies and travellers (including travelling show people), with sites identified in line with national policy.
- 3.48 Policy H10 in the Lambeth Local Plan Proposed Submission safeguards the existing travellers' site in Streatham Vale and recognises the need to identify a new site or sites for additional facilities to meet the accommodation requirements of gypsies and travellers over the lifetime of the plan. The policy also sets out the criteria against which any new sites that come forward would be assessed.
- 3.49 The target for additional pitches set out in Lambeth's Core Strategy 2011 (Policy S2 (f), 10 additional pitches) was based on the findings of the 2008 London Boroughs' Gypsy and Traveller Accommodation Needs Assessment (GTAA) (Fordham Research, March 2008). The GTAA was carried out to inform the evidence base for the replacement London Plan and relies on data now over five years old.
- 3.50 To ensure that the council's policies are appropriate and based on robust evidence, a new assessment of the current and future accommodation needs of gypsies, travellers and travelling showpeople in Lambeth is required. The study will inform the development of a strategy to meet identified need, which will include a local target for pitch and/or plot provision and a subsequent assessment of the supply of deliverable sites, to address the requirements of the PPTS.
- 3.51 In order for policies on all other aspects of the Lambeth Local Plan to proceed without delay, the development of a strategy to address gypsy and traveller accommodation provision is being taken forward in a separate gypsy and traveller development plan document. The programme for this is set out in the Local Development Scheme November 2013.
- 3.52 The council has appointed consultants Opinion Research Services to undertake a new assessment of need for future accommodation for gypsies and travellers in Lambeth. The study will be complete by early 2014.

#### **4. Housing standards (Policy H5)**

- 4.1 Policy H5 cross-refers to the internal space standards set out in the London Plan and supplementary planning guidance. The policy sets out Lambeth-specific standards for outdoor amenity space, reflecting local circumstances.
- 4.2 Lambeth has an existing deficit of open space (ref. Lambeth Open Spaces Strategy February 2013), and a rising population placing additional pressure on existing spaces. Being one of the most densely populated

areas in the country there are limited opportunities for creating major new areas of open space in the borough. It is therefore essential that opportunities to provide amenity space in new residential developments are maximised.

- 4.3 The amenity space standards set out in Policy H5 have been applied through supplementary planning guidance since July 2008. These established standards have been shown to be deliverable and have achieved good results.
- 4.4 Acknowledging concerns raised during consultation that the draft Local Plan contains inadequate flexibility in the application of amenity space standards, the supporting text has been amended to reflect London Plan guidance which allows the inclusion of additional internal living space where there is a shortfall in amenity space.

## **5. Viability**

- 5.1 Paragraph 173 of the NPPF requires that local planning authorities give careful attention *“to viability and costs in plan-making and decision-taking”*. The NPPF requires that *“the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”*. After taking account of policy requirements, land values should be sufficient to *“provide competitive returns to a willing landowner and willing developer”*.
- 5.2 As stated in section 3 above, the council commissioned BNP Paribas to test and demonstrate the ability of a range of development types throughout the borough to viably meet the emerging planning policy requirements in the Draft Local Plan 2013 and proposed CIL rates. The results are set out in two reports, both of which are published on the council’s website.
- ‘Draft Lambeth Local Plan 2013 – Affordable Housing Policy – Viability and Strategy Assessment’: This is an assessment of the impact of the affordable housing policies within the Draft Local Plan 2013 on development viability.
  - ‘Draft Lambeth Local Plan 2013 – Viability Study’: This is an assessment of the cumulative impact of the policies in the Draft Lambeth Local Plan 2013 plus the proposed CIL charging schedule on development viability.
- 5.3 The viability testing of the cumulative impact of the emerging housing policies and other requirements (sustainability, Lifetime Homes, CIL and Mayoral CIL) demonstrates that the council’s proposed approach will ensure the viability of developments is not adversely affected over the economic cycle. The assessment provides evidence to show that, in

accordance with the NPPF, the policy requirements for development set out within the plan do not threaten the ability of the sites and scale of that development to be developed viably.