

LBL01 – Council response to INS01 Initial Inspector questions and thoughts (16 July 2020)

6 August 2020

The Inspector's questions are repeated below in blue, followed by the Council's response in black.

All references in the Council's responses to the London Plan should be read as references to the Draft London Plan Intend to Publish Version December 2019 (SD03 in the examination library), unless otherwise stated.

Where documents published in the examination library are referred to in the responses below, a hyperlink is provided with the document reference number.

To support its responses to questions 5.1 to 5.6, the Council has produced Topic Paper 10: Housing Provision Statement. This has been published in the examination library with reference number TP10.

1. Strategic considerations

1.1 The Greater London Authority (GLA) expresses the view that the Revised Lambeth Local Plan (the Plan) should set out clearly on maps its relationship to the **London Plan Opportunity Areas** (OAs), at Vauxhall/Nine Elms/Battersea and at Waterloo and reflect the indicative targets for 18,500 new homes and 18,000 new jobs at V/NE/B and 1,500 new homes and 6,000 jobs at Waterloo. It would therefore be helpful for these strategic provisions to be addressed in the Plan.

Council response

The two Opportunity Areas are shown on the Key diagram on page 58 of the draft Plan as growth areas. The Waterloo Opportunity Area is also shown on diagram PN1 Waterloo on page 337, and the VNEB Opportunity Area (the part within Lambeth) on diagram PN2 Vauxhall on page 363. The precise boundaries of the Opportunity Areas are also marked on the adopted Policies Map 2015 and these will be carried forward unchanged onto the revised Policies Map.

The London Plan Opportunity Areas are referenced under guiding spatial approach on page 51 of the draft Plan, in the Spatial Vision on page 53 and in strategic objective 18 on page 57. The indicative targets for new homes and jobs in each area are specifically addressed in paragraphs 11.1 (page 337) and 11.19 (page 362) for Waterloo and VNEB respectively, in the sections of the Plan that deal with those parts of the borough.

A comment about this from the GLA was addressed in the Statement of Common Ground agreed between Lambeth and the Mayor on 21 May, published in the examination library as SCG01 – see items Myr1 and Myr2 on page 5 of that document. The GLA has accepted through this SCG that no change to the plan is required in response to this comment.

1.2 It is also important that the Plan provides a clear articulation of its relationship with the **Central Activities Zone**, including its relationship within the **Central Services Area**.

Council response

The council has proposed an amendment to Policy ED3 and its supporting text to include reference to the Central Service Area. This amendment was proposed and agreed in the Statement of Common Ground with the Mayor (SCG01) – see Myr3 on page 5, plus the text in red on pages 23-24 of that document. This proposed amendment is also listed in the schedule of potential changes included in the examination library as document SD17a (see reference number PC026 on pages 7-8 of that document).

2. Sustainable development

2.1 The information in the **Sustainability Appraisal (SA)** and technical appendices need to be sufficiently robust to justify the location and quantum of major new development in the Plan. In the Non-Technical Summary, it states (para 8.10), that previous work undertaken on the 2015 Plan remains relevant. It would be helpful to have a **statement from the Council**, explaining the previous work on reasonable strategic alternatives, and why this is still relevant for the submitted Plan.

Council response

The DRLLP PSV January 2020 is a partial review of the adopted Lambeth Local Plan 2015 and this has been made clear from the outset and through the process of its preparation. The Lambeth Local Plan 2015 in turn built on the spatial planning approach adopted in the Lambeth Core Strategy 2011, whilst incorporating more detailed development management policies into a single development plan document. There has therefore been an evolution of spatial planning in Lambeth over the last nine years, and the DRLLP PSV does not represent a radical change of direction or introduce significant changes in overall strategic approach, but is a further stage in this evolution.

This evolution is evidenced by the fact that the six ‘spatial planning issues’ set out in sections 2 of the Lambeth Core Strategy 2011 are in the same as those in the Lambeth Local Plan 2015 and the DRLLP PSV 2020, albeit there has been a

degree of updating of evidence sources at each review. They are: accommodating population growth, achieving economic prosperity and opportunity for all, tackling and adapting to climate change, providing essential infrastructure, promoting community cohesion and safe liveable neighbourhoods, and creating and maintaining attractive distinctive places. The reason these remain valid is that key trends and issues in the borough have not fundamentally changed. Thus principal demographic trends remain an ongoing growth in population, decreasing household sizes and growing diversity. Lack of access to affordable housing has been a key issue throughout this period, although the severity of the affordability gap has worsened. There have been peaks and troughs in economic growth, resulting in significant levels of employment and unemployment, but the underlying make-up of the Lambeth economy and its business base and therefore the potential for growth have not fundamentally altered. A wide range of environmental issues were identified in the 2011 Core Strategy, all of which remain valid today.

The same is true of Section 3 of the Core Strategy, Local Plan and DRLLP PSV. Thus paragraph 3.9 of the Core Strategy, which sets out the guiding spatial approach, remains in the Local Plan 2015 and DRLLP PSV, with only limited updating in the latter document (indicated through strike-through and underline) to reflect matters that have changed in the Mayor's new London Plan. Similarly, the spatial vision and strategic objectives have evolved through limited updating from the original versions adopted in 2011 and have not needed to undergo a fundamental review.

The Council's assessment of reasonable strategic alternatives for spatial planning Lambeth therefore commenced in 2008 through the sustainability appraisal of the Issue and Options consultation for the emerging Core Strategy, and has evolved from the finalisation of that document in 2011, through the preparation of the Lambeth Local Plan in 2013 and 2014 and its finalisation in 2015 and finally to the preparation of the Draft Revised Lambeth Local Plan since 2016/17 leading up to the Proposed Submission Version dated January 2020. The sequence of documents charting this evolution and the associated assessment of reasonable alternatives is set out in the table in Appendix 1 of this response.

In large part the London Plan 2011 set down much of the strategic spatial strategy for Lambeth that remains in place today. The key elements of this are the two London Plan Opportunity Areas of Waterloo and Vauxhall Nine Elms Battersea (also known as Nine Elms Vauxhall); the London Plan Central Activities Zone which covers the north of north of the borough; the town centre hierarchy, which defines two major town centres in Brixton and Streatham and nine district centres across the rest of the borough; identification of Metropolitan Open Land; and the classification of Lambeth as a location of Locally Significant Industrial Sites (LSIS) which must be protected (identified as Key Industrial and Business Areas (KIBAs) in Lambeth planning documents). This strategic spatial framework defines the key locations for growth and development in the borough

and underwent sustainability appraisal at the level of the London Plan. They were reflected in the Core Strategy 2011, following a process of consideration and appraisal of reasonable strategic alternatives during the preparation of that document.

This strategic spatial framework did not change fundamentally in the Further Alterations to the London Plan 2015, which informed the Lambeth Local Plan 2015, or in the emerging new London Plan that has informed the Draft Revised Lambeth Local Plan. During this time period no new Opportunity Areas were proposed and no major new transport infrastructure projects came forward that could influence new locations for growth (other than the Northern Line extension that is now under construction and relates to growth in the Vauxhall Opportunity Area). There has also been no fundamental change to the town centre hierarchy and LSIS remains a London Plan designation. Therefore, it has not been necessary to revisit these over-arching reasonable strategic alternatives relating to key locations for growth and development in the borough because they remain unchanged and no new alternatives have arisen. For this reason, this element of the initial appraisal of reasonable strategic alternatives undertaken for the Core Strategy remains valid in the view of the Council.

Other aspects of the London Plan have changed since 2011 and Lambeth's response to these has been duly considered through sustainability appraisal of reasonable alternatives each time the Lambeth-level development plan has been reviewed (as set out in the table in Appendix 1).

The most obvious example is the borough-level housing target, which has changed over this time from 1,195 dpa in 2011, to 1,559 dpa in 2016 and 1,335 dpa in the 2019 Intend to Publish London Plan, based on evidence of capacity identified through different iterations of the London-wide SHLAA led by the GLA. Each iteration of the Lambeth Core Strategy and Local Plan has responded to this change in housing target by considering different options for meeting and exceeding it, and reasonable alternatives have been subject to sustainability appraisal each time (including during the preparation of the DRLLP PSV). This has included at each stage consideration of the relationship between designated industrial land (KIBAs) and housing delivery.

Other key London Plan requirements relate to the borough-level waste apportionment, locations for tall buildings and the approach to delivery of affordable housing. Again, each iteration of the Lambeth-level development plan has considered reasonable alternative approaches to each of these issues and these have been appraised through the sustainability appraisal each time.

Therefore, the appraisal of reasonable strategic alternatives has incrementally built on the initial work undertaken for the Core Strategy in order to refine the approach and respond to relevant changes in the London Plan (and where relevant changes in national planning policy), rather than fundamentally

revisiting the key spatial elements around locations for growth that have not been subject to change during this period.

In addition to the London Plan, the over-arching context for the partial review of the Lambeth Local Plan 2015 has been the revised [Future Lambeth: Our borough plan 2016-2021 as updated July 2019](#) (EB01) (the 'community strategy'). In preparing the DRLLP PSV Jan 2020, the overall vision and strategic approach in the existing Lambeth Local Plan 2015 were considered to be consistent with the three priorities of the revised Lambeth Borough Plan: inclusive growth, reducing inequality and strong and sustainable neighbourhoods. In this regard, the vision and strategic approach in the Lambeth Local Plan 2015 were considered to remain fit for purpose (subject to factual updating) for the DRLLP PSV Jan 2020.

3. Indication of the Plan Period

3.1 It is very important for the Plan to indicate, not only its full title on the front cover, but the **plan period**.

Council response

Noted and accepted. The plan period can be added to the front cover of the Plan.

3.2 For the purposes of paragraph 22 of the Framework, I would like to know the Council's view as to whether its housing policies, and in particular policy H1 (maximising housing growth) are considered to be strategic. If so, should the Plan make housing provision over at least a **15-year plan period**, which should also extend from adoption, which is required in the case of a strategic plan?

Council response

Yes, in the Council's view its housing policies, including policy H1 (maximising housing growth) are considered to be strategic. Annex 12 of the DRLLP PSV 2020 lists which policies are considered to be strategic and non-strategic, in accordance with paragraph 21 of the Framework. All of the housing policies are identified as strategic in this Annex.

The plan period is therefore 15 years as stated in paragraph 3.2 of the draft Plan.

Paragraph 3.3 and Policy H1 of the DRLLP PSV refer to Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29 because this is the period for which the London Plan sets a borough-level target (see London Plan Policy H1 and Table 4.1). However, the Council notes paragraph 4.1.12 of the London Plan which states how boroughs should address

a strategic target beyond the 10 year period (2019/20 to 2028/29), if this is required. In response to a comment from the Mayor on this point, the Council has proposed an amendment to paragraph 3.3 of the draft plan to make clear that if a target is required beyond the ten year period to 2028/29, this will be based on the 2017 SHLAA findings, local evidence of housing capacity and by rolling forward the borough's small housing sites figure. This is shown on page 17 of SCG01, and in the schedule of potential changes (SD17a) as item PC010.

This point is explored further in Topic Paper 10: Housing Provision Statement (TP10).

Duty to Cooperate

4.1 Given that the legal responsibility for the Duty to Cooperate rests with the individual London Boroughs, and also given the **London-wide housing shortfall** of 140,000 homes over the ten years from 2019/20 to 2028/29, (based on paragraph 6 of the Secretary of State's letter dated 13 March 2020), should the Council be addressing this in this Plan in cooperation with its neighbouring LPAs?

Council response

The Council's answer to this question is no, for the reasons explained below.

Paragraph six of the Secretary of State's letter dated 13 March 2020 ([SD03a](#)) states:

"Following the Planning Inspectorate's investigation of your Plan, they only deem your Plan credible to deliver 52,000 homes a year. This is significantly below your own identified need of around 66,000 homes and well below what most commentators think is the real need of London. As I have set out, the shortfall between housing need in London and the homes your Plan delivers has significant consequences for Londoners."

However, paragraph fourteen of the same letter concludes:

"Your Plan must be brought to the minimum level I would expect to deliver the homes to start serving Londoners in the way they deserve. *However, this must be the baseline and given this, I ask that you start considering the next London Plan immediately and how this will meet the higher level and broader housing needs of London.*" (emphasis added)

Thus, whilst the Secretary of State wants the Mayor to support ambitious boroughs in exceeding their housing targets, he accepts that the shortfall between identified need and the level planned for in this version of the London Plan will ultimately need to be addressed through a new London Plan that considers alternative approaches.

The same conclusion was reached by the London Plan examination panel in their report dated 8 October 2019 (SD03c), although there may be a difference of opinion between the Panel and the Secretary of State about how quickly such a review can be undertaken. The London Plan examination panel ultimately conclude at paragraph 178 of their report that the revised 52,285 dpa overall housing target for London is justified and deliverable, and is higher than the overall target in the current London Plan. They add important commentary on London's capacity for more housing at paragraph 599: "the position in London is that capacity for new housing development is finite. Indeed, the Plan relies on re-cycled land. The approach of sustainable intensification can only be taken so far without having an adverse impact on the environment, the social fabric of communities and their health and well-being. Therefore, in our view, there would be little to be gained from requiring an immediate review until such time as a full review of London's Green Belt has been undertaken as recommended to assess the potential for sustainable development there and whether and how the growth of London might be accommodated".

The Panel therefore conclude that the London Plan goes as far as it can in planning to meet identified housing need and that little more can be done to meet the unmet need until fundamentally different options for increasing the capital's capacity for new housing are considered. They also conclude that the borough-level housing targets provide an appropriate basis, or 'apportionment' for the boroughs to plan for housing in their areas

It is key principle in London that housing need is established through the strategic spatial strategy at London-wide level, based on evidence in the London-wide SHMA, and that this process of identifying the level of housing need does not need to be repeated at borough level. Therefore the requirement in NPPF paragraph 60 for strategic policies to be informed by a local housing need assessment is dealt with in London through the London Plan rather than through individual borough Local Plans. Similarly the SHLAA required by NPPF paragraph 67 is dealt with at London-wide level in London.

Thus the Intend to Publish London Plan states at paragraphs 0.0.21 and 0.0.22:

"The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way and has been found sound by the planning inspectors through the examination in public. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, *boroughs do not need to revisit these figures as part of their local plan development.*

The Plan does not meet all of London's identified development needs. Work will need to be undertaken to explore the potential options for meeting this need sustainably in London and beyond. This is a matter for a future Plan, and requires close collaboration with local and strategic authorities and partners. Clear commitment from the Government is essential to support the

consideration of these options and the significant strategic infrastructure investment requirements associated with them.” (emphasis added)

Further relevant information is included in paragraph 4.1.1 and 4.1.2:

“The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons’ accommodation within the overall figure.

For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The advantage of strategic planning is that it allows London to focus development in the most sustainable locations, allowing all of London’s land use needs to be planned for with an understanding of how best to deliver them across the capital.

Because of London’s ability to plan strategically, boroughs are not required to carry out their own housing needs assessment but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA.” (emphasis added)

The new London Plan is therefore very clear that it plans strategically for housing and the boroughs’ role in this is to plan to meet the borough-level housing targets it sets them.

This position is significantly different from that in the current London Plan 2016, which requires boroughs to “draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need and supply” (Policy 3.3 Da). This policy clause was added to the London Plan by the then Mayor after the examination of the Further Alterations to the London Plan in 2016 but has not been carried forward into the new London Plan.

The DRLLP PSV has been prepared to achieve general conformity with the emerging new London Plan, not the London Plan 2016. In the strongly held view of Lambeth Council, there is no requirement on it to plan to address the London-wide housing shortfall beyond the borough-level housing target established through the new London Plan. The Council therefore fundamentally disagrees with the arguments on this matter presented by the Home Builders’ Federation (HBF) in their Regulation 20 representation ([\(R023\)](#)). It is not the legal responsibility of the boroughs to manage the housing shortfall within Greater London, as is suggested by the HBF.

With regard to the Duty to Cooperate, the Council accepts that technically this Duty does not fall to the Mayor. However, the question of whether it is the Mayor’s responsibility to plan strategically across London for the shortfall against

London's identified housing need does not come down to whether or not the Mayor is subject to the Duty to Co-operate, other than in respect to cooperation with out of London authorities. It is simply a matter of fact that the London SHMA and SHLAA are undertaken by the Mayor for London as a whole and that the Mayor's London Plan – the strategic spatial strategy for London – plans strategically for housing at a London-wide level. This responsibility and this approach derive from the Mayor's duties to bring forward a strategic spatial strategy in the form of the London Plan and are unaffected by debates about whether or not the Mayor is subject to the Duty to Cooperate.

Turning to Lambeth's own Duty to Cooperate, the Council fully accepts its responsibilities and has addressed them. The Council notes the following section of the Planning Practice Guidance on this matter:

"Does the duty to cooperate apply in London, and other combined authority areas?

The duty to cooperate applies in London, and other combined authority areas. Within these areas local planning authorities are required to cooperate with each other, county councils, other local planning authorities outside the combined authority area, and prescribed public bodies. *The degree of cooperation needed between these parties will depend on the extent to which strategic matters have already been addressed in the spatial development strategy.*" (emphasis added)

Paragraph: 033 Reference ID: 61-033-20190315

Revision date: 15 03 2019

The guidance is therefore very clear that some strategic matters will be addressed in the spatial development strategy for London, which is the London Plan.

With this in mind, and given the role of the London Plan as spatial development strategy in planning strategically for housing, Lambeth has agreed a Statement of Common Ground with each of its neighbouring boroughs, covering the strategic cross-border planning matters required by the NPPF. These have been submitted or examination and are published in the examination library with reference numbers SCG02 to SCG09. These statements address the question of housing need and supply: Lambeth and all its neighbours agree that the strategic matter of housing targets is dealt with through the London Plan. These statements do not therefore need to address the matter of planning to meet London's overall housing shortfall.

The Statements of Common Ground do address each borough's requirement to meet its own housing requirement defined through the London Plan borough-level housing targets. In the case of the Cities of London and Westminster and the boroughs of Croydon, Southwark, Wandsworth and Bromley, the agreement

between Lambeth and the other party is that each authority can meet its own housing requirement within its own border: no requests are made by or to Lambeth for assistance in meeting unmet housing need. The borough of Merton did ask Lambeth for assistance in meeting its new London Plan housing target but Lambeth stated that it did not have sufficient surplus capacity to assist other boroughs in meeting their requirement and therefore that it was not able to assist Merton in this respect. Merton accepted this position. See [SCG07](#) section 4.2.

Lambeth notes that the City of Westminster submitted a Local Plan for examination in November 2019 which set a higher housing delivery target than that in the new London Plan – higher by some 400 dpa. Since then, in response to questions from the examining Inspectors, Westminster has accepted that this higher target is not deliverable and that it now wishes to align its target with that in the new London Plan. This reinforces the robustness of the evidence underpinning the new London Plan housing targets and the risks associated with ambitious boroughs setting higher targets where there is no evidence such a target can be delivered. See the exchange of letters between the Inspectors and Westminster City Council on that authority's examination webpage:

<https://www.westminster.gov.uk/cityplan2040>

To conclude, Lambeth Council should not be addressing the London-wide housing shortfall in cooperation with its neighbours. Its responsibility is to plan to meet its new London Plan borough-level housing target. Lambeth has fulfilled this responsibility as well as its Duty to Cooperate. The latter is evidenced by the Statements of Common Ground agreed between Lambeth and each of its neighbouring boroughs, all seven of which agree with Lambeth's position about the role of the London Plan in strategic planning for housing in London.

4.2 Where does the Council consider **the balance** to lie between the London Plan (Intend to Publish version) and the individual Boroughs and Development Corporations in addressing the London-wide housing shortfall?

Council response

Given the answer to question 4.1 above, the Council does not consider there to be a balance between the London Plan and the boroughs in addressing the London-wide housing shortfall. This responsibility does not fall to the boroughs. It has been accepted by the London Plan Examination Panel, the Mayor and the Secretary of State that London is not currently able to meet the full 66,000 dpa housing need, that the new London Plan provides the basis for delivery of 52,000 dpa and that the question of the shortfall will need to be considered through a further review of the London Plan.

Housing need and provision

5.1 Following on from matter 3.2 above, I accept that the London Plan (para 4.1.12) seems to pose the question rather than require a housing target beyond the ten-year period. If the Council considers that the Plan should address housing needs over a 15-year period (or thereabouts) I need to explore the indicative housing provision to cover the remaining years of the plan period, in accordance with the requirements of paragraph 67 (b) of *the Framework*.

Council response

The Council agrees that there is a lack of clarity on this point both in the London Plan and in the Framework, given paragraph 67(b) asks planning policies to supply evidence of specific, developable sites or broad location for growth “where possible, for years 11-15 of the plan”. Notwithstanding this, the Council has provided information about indicative housing provision for years 11-15 in the attached Topic Paper 10: Housing Provision Statement (TP10), having regard to paragraph 67(b) of the Framework and the definition of ‘developable’ in the glossary of that document.

5.2 Policy H1 of the London Plan requires the provision of 13,350 new homes in Lambeth within a ten-year period. The Plan needs to provide a firm basis for securing both this total and a separate total covering small sites (as part of this overall total), a matter on which the Secretary of State expressed his concern in paragraph 18 of his letter. In order to be delivery focused, as required in the London Plan policy H1.B.(1a), and the Secretary of State’s letter, the Plan needs to allocate a **sufficient range and number of housing sites** that are suitable for residential and mixed-use development and intensification. The trajectory in Appendix 13 to the submitted Plan provides some detail for the large (0.25ha plus) sites, but nothing on the small sites (400 dpa). Detail on the realistic implementation of all sites, including the small sites, is important both for the overall effectiveness of the Plan, and also for assessing the five-year situation.

Council response

Please see Topic Paper 10: Housing Provision Statement (TP10).

5.3 It would also be helpful at an early stage to understand details of the ‘Other sites’; (12 in all I notice) and whether the sites identified under ‘permission subject to S106’ are realistic, or whether there are significant issues which would cast doubt on the effectiveness of the Plan.

Council response

Please see the Topic Paper 10: Housing Provision Statement (TP10), which provides further information about sites.

5.4 In the light of the above comments, what would be helpful at this point is to have from the Council a statement, setting out the **principal components of the Plan's housing provision**, including a schedule of all the large (Strategic) sites, and a summary of the small sites and their status. Clearly, part of the small sites allowance should include windfall sites, but the evidence should be compelling and not just an extrapolation of past trends; for example, is there robust data to support the figure in the Plan? My initial view (subject to the Council's response to matter 3.2) is that this statement should provide a list of sites extending in their likely implementation over the full length of the plan period, i.e. not just for the London Plan ten years. Clearly, there is more uncertainty the further into the future you go, and broad locations for growth could be identified for the remaining years of the plan period beyond the ten years of the London Plan.

Council response

Please see Topic Paper 10: Housing Provision Statement (TP10).

5.5 Regarding the **Five-Year Housing Land Supply**, I notice that the period set out in Appendix 13 of the submitted Plan starts in 2020/21. Should it not start at 2019/20, in general conformity with the first year of the London Plan? The trajectory is also quite uneven over the five-year period. Again, I need to have more detail on the small site contribution.

Council response

Noted, the five year housing land supply period can be amended to start at 2019/20. This is reflected in Topic Paper 10: Housing Provision Statement (TP10), which also addresses the other parts of this question.

5.6 I need a **statement identifying the Council's five-year housing land supply**, and which provides the following essential information: (i) target figure and its justification; (ii) the appropriate size of the buffer, based on the previous five years' housing supply; (iii) whether any shortfall (if it exists) needs to be made good over the five-year period, or over the entire plan period (i.e. either the Sedgefield or Liverpool method); (iv) whether an allowance has been made for non-completions, and if so, what; and (v) a summary of the principal components of the five-year supply, including small site information.

Council response

Please see Topic Paper 10: Housing Provision Statement (TP10).

5.7 Policy H2 for **affordable housing (AH)** refers to the London Plan policy H5 approach but stops short of specifying clear percentages for schemes in relation to particular dwelling numbers. Should not the Plan either state its intention to implement London Plan policy H5 targets or set out its own targets? It also needs to be supported by a viability justification.

Council response

In the view of the Council, DRLLP PSV Policy H2 does state very clearly in part (i)(a) its intention to implement London Plan Policy H5: "Residential developments and mixed-use development that include residential should provide affordable housing through the threshold approach set out in London Plan policy H5".

The London Plan states at paragraph 0.0.23 that "The London Plan is part of the Development Plan. The policies have been drafted in a way that allows London to implement this ambitious London Plan as soon as possible. *There is no requirement for the policies to be repeated at the local level.* However, in some instances a local approach is required within the context of the overall policy. The London Plan clearly sets out where this is the case." (emphasis added)

London Plan policy H5 takes a threshold approach to affordable housing rather than setting targets and is intended to be applied directly to development proposals. It does not require, or indeed allow for, boroughs to set affordable housing targets in their Local Plans.

For these reasons, DRLLP PSV Policy H2 does not repeat the thresholds in London Plan policy H5 or set its own affordable housing targets.

The use of the affordable housing thresholds set in the London Plan is supported by a viability justification. They have been tested as part of the whole plan viability assessment submitted for examination with the DRLLP PSV: LB Lambeth Local Plan and CIL Viability Review, BNPP December 2019 ([EB97](#)). This is made clear in paragraph 2.43 of that report on local policy context and again in paragraph 5.2 in relation to appraisal outputs. The threshold levels of 35% and 50% are also clearly identified in the appraisal tables at the back of the report. The study concludes on page 6 that "The Council needs to strike a balance between achieving its aim of meeting needs for affordable housing with raising funds for infrastructure, and ensuring that developments generate acceptable returns to willing landowners and willing developers. This study demonstrates that the Council's approach to applying its affordable housing requirements ensures that these objectives are balanced appropriately". The footnote to this conclusion (footnote 3 on page 6) clarifies again that the Council intends to adopt the Mayor's threshold approach to affordable housing which requires a minimum 35% affordable housing with no viability assessment required and no post-implementation review providing construction commences within pre-agreed timescales.

The policy, by seeking AH from sites providing fewer than 10 dwellings, would appear to run contrary to paragraph 63 of the Framework. What is the justification for this?

Council response

The detailed justification for Policy H2(a)(iii) relating to affordable housing on sites providing fewer than 10 dwellings is set out in [Topic Paper 1 \(TP01\)](#). There is additional information and data about affordable housing need in Lambeth in Topic Paper 9 ([TP09](#)), pages 29 to 33.

What is the difference in tenure percentage in this Plan when compared to the provisions in the London Plan, and what is the evidence base for this?

Council response

London Plan Policy H6 on affordable housing tenure states the following in part A:

“The following split of affordable products should be applied to residential development:

- 1) a minimum of 30 per cent low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
- 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- 3) the remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.”

DRLLP PSV Policy H2 responds to this by requiring 70 per cent as low cost rented homes (Social Rent or London Affordable Rent) and 30 per cent as intermediate products including London Living Rent and London Shared Ownership. This is consistent with the London Plan policy because in the view of Lambeth the “remaining 40 per cent” referenced in part A(3) should all be provided as low cost rented homes on the basis of identified need in the borough. The evidence base for this is the Lambeth Strategic Housing Market Assessment (SHMA) 2017 ([EB09](#)).

Section 2 of the SHMA assesses household incomes in Lambeth. In June 2017, the median household income in Lambeth was £33,280 and the mean household income was £39,986, which emphasises a heavy concentration of households in lower income bands. This is illustrated by Figure 21 of the SHMA. Section 2 also

explains that Lambeth, like many other London boroughs, has high sale and rental prices and has experienced worsening affordability in recent years. Sales and rental values in Lambeth are above London averages, which is to be expected given higher value areas particularly in the north of the borough. Values are comparable to other inner London boroughs.

This assessment is confirmed by the Mayor's Housing in London 2019 report ([SD24](#)) (section 4), which finds that the typical private renting household in London is now spending 37% of their income on rent and that average private rents in London have risen by 42% since 2005, by far the largest increase of any English region. Between 2005 and 2016, average private rents in London rose 38%, while average individual earnings rose just 21%, leading to worsening affordability. The chart at paragraph 4.18 of this report shows that Lambeth ranked tenth among London boroughs in terms of monthly market rents for a two-bedroom home in 2019. The chart at paragraph 4.21 shows the differential across London between median weekly rents for social rent and Affordable Rent (up to 80% of market rent). The average two-bedroom Affordable Rent in London was £199 a week in 2017/18 compared to £153 a week for the new London Affordable Rent product (considered to be low cost social rent). The price to earnings ratio in Lambeth was 14.5 in 2018, compared to 12.3 for London as a whole (shown in table 3 of the Housing in London 2019 report).

Section 3 of the Lambeth SHMA assesses affordable housing need in the borough according to the approach in the Planning Practice Guidance and concludes that, based on households spending 40 per cent of their gross household income on rent, the need for affordable housing over 20 years is 1,047 net additional homes per year; and if households spend 30 per cent of their gross household income on rent this figure rises to 1,573 affordable homes per year. Bearing in mind the annual overall housing requirement for Lambeth is 1,335 net additional dwellings per annum (dpa), this ranges from 78 and 118 per cent of all housing that needs to be delivered in the borough. This is clearly undeliverable through the planning system alone but demonstrates the very high level of affordable housing need in Lambeth.

Section 3 of the SHMA also considers the relative affordability of different types of affordable housing based on data about household incomes in the borough and finds that shared ownership products could meet between 0 and 5 per cent of total affordable housing need and that the Mayor's London Living Rent product has potential to meet the needs of between 25 and 35 per cent of housing need, depending on the level of income households spend on rent. Therefore the overall range of affordable housing need that can be met by intermediate products is between 25 and 40 per cent. In setting the policy requirement in H2 at 30 per cent, the Council has taken the mid-point in this range.

With regard to unmet need for low cost rented accommodation in the borough, the position is worsening as a result of reduced supply. The annual number of

Council and housing association lettings has fallen from 1,613 to 894 (46%) over the last ten years, and is down 62 per cent from its peak in 2010/11. The biggest reduction has been in the number of Council lettings, down by 52 per cent over ten years, and down 69 per cent from its peak in 2010/11. The reason for this trend is a significant reduction in available supply of social housing in Lambeth, especially Council housing, over the last ten years, which has reduced the amount of housing available to meet housing needs. There is increasing unmet demand for housing in Lambeth as a result. This is indicated by the average number of people bidding for each property, which is a better indicator of current demand than the total number on the housing register. There has been a steady increase over the past five years, with an overall increase of 56 per cent between 2015/16 and 2019/20. The data supporting these findings is presented in Topic Paper 9 ([TP09](#)), pages 29 to 33.

These figures suggest the limited supply of low cost rented accommodation in the borough is worsening and is significantly restricting the Council's ability to house those in priority housing need. There are currently approximately 2,300 people housed in temporary accommodation in the borough. Approximately 500-600 private sector placements are made a year to prevent homelessness, but this is an insecure form of housing and brings with it a heavy burden in public sector subsidy through Local Housing Allowance. The benefit cap makes this insecurity particularly severe for families in private rented accommodation, because the housing element of the allowance is squeezed out by child benefit: many housed in this way therefore find themselves homeless again as a result of even a slight changes in personal circumstances.

There is therefore a clear and urgent need to significantly increase the stock of low-cost rented accommodation in the borough, in order to achieve greater resilience and independence for some of the borough's most vulnerable residents. Intermediate affordable housing is equally important to achieve mixed and balanced communities and support the 'squeezed middle' (including many essential public sector workers, although few have household incomes as high as £60,000 per annum, which is the cap for London Living Rent, let alone £90,000 which is the cap for London Shared Ownership). However, the proportion of intermediate housing secured must be commensurate with the level of need intermediate products can effectively meet in the borough.

The evidence therefore suggests 30 per cent is an appropriate policy requirement for intermediate affordable housing, matched by 70 per cent low cost rented housing to achieve the much needed uplift in stock for that type of property. This tenure split has also been tested for viability in the Council's Local Plan and CIL Viability Review December 2019 (table 4.8.1, table 6.10.2).

Also, what is the reason for deleting the previous sections (c) and (d) of the policy, which required the Council to take into account the individual circumstances of particular sites, including viability, which seems to be out of general conformity with the London Plan, which has viability as a primary consideration?

Council response

The London Plan has viability as a primary consideration but this is built into the new threshold approach to affordable housing delivery, set out in London Plan Policy H5. This threshold approach distinguishes between applications that can follow the Fast Track Route, which are not required to provide a viability assessment at application stage and are only subject to an early stage viability review to incentivise delivery within two years of the permission being granted; and applications that must follow the Viability Tested Route supported by detailed viability evidence to be submitted as part of the application, and subject to both early and late stage viability reviews. Eligibility for Fast Track is determined by a series of criteria, of which providing the required threshold level of affordable housing on site without grant is the first. As stated in paragraph 4.5.4 of the London Plan, "This approach seeks to embed affordable housing requirements into land values and create consistency and certainty across London".

DRLLP PSV Policy H2 makes clear in section (a)(i) that affordable housing should be provided through the threshold approach set out in London Plan Policy H5. There is no need to repeat the London Plan policy, a principle clearly stated in London Plan paragraph 0.0.23 (see above). As a result, former Local Plan Policy H2 sections (c) and (d) would cause confusion if retained: given the comprehensive guidance on implementation of the threshold approach provided in the London Plan, it was considered simpler and clearer to redraft Local Plan policy H2 in full to align with it.

This approach reflects NPPF paragraphs 34 and 57 and the updated Planning Practice Guidance on viability, which states:

"How should plan makers set policy requirements for contributions from development?"

Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.

It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. Policy compliant

means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions.”

Paragraph: 002 Reference ID: 10-002-20190509

Revision date: 09 05 2019

And:

“Should viability be assessed in decision taking?”

Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Policy compliant in decision making means that the development fully complies with up to date plan policies.”

Paragraph: 007 Reference ID: 10-007-20190509

Revision date: 09 05 2019

The Council’s approach in policy H2 is therefore consistent with national policy and in general conformity with the London Plan. This is confirmed by the Mayor’s letter on general conformity dated 13 March 2020 ([R054](#)), which states: “The Mayor welcomes that Lambeth has set out its intention to follow the Threshold Approach to affordable housing in accordance with Policy H5 of the Intend to Publish London Plan” (page 2).

5.8 Policy H8 refers to **specialist older persons’ housing** but stops there. It would appear not to be in general conformity with policy H13 of the London Plan? (which has a target of 70 units of older persons’ housing each year for the period 2017-2029.) Is there a robust justification for this?

Council response

The annual borough-level figures included in London Plan Table 4.3 are benchmarks rather than targets and cover a broad range of types of housing that can be used by older people, within the C2 and C3 use classes, as is made clear in the supporting text to London Plan policy H13. Paragraph 4.13.9 states that these benchmarks are designed to inform local level assessments of specialist housing need.

The need for older persons’ housing in Lambeth has been assessed in the [Lambeth SHMA 2017](#) (EB09) (page 69 onwards), in accordance with the

requirements of the NPPF (paragraph 61) and PPG (Paragraph: 004 Reference ID: 63-004-20190626).

It is noted that the Glossary of the NPPF defines older people as "People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs." This makes clear that a proportion of housing need for older people will be met through general needs housing where this is accessible and adaptable.

Planning practice guidance advises on plan-making for specialist housing needs including older people. It states at Paragraph: 006 Reference ID: 63-006-20190626 that "Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require. They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period." The subsequent paragraph adds that "Local planning authorities can include the provision of housing for older and disabled people when preparing the Authority Monitoring Report."

In the Council's view, the DRLLP PSV fully addresses these requirements through its housing policies, in combination with the policies in the London Plan. In many cases, older people require general needs housing within the C3 use class (so long as it is accessible and adaptable), which in the majority of cases will be assessed under the general housing policies in the Plan rather than Policy H8.

DRLLP PSV policy H5 states that all proposals for new residential development, including new-build dwellings, conversions and change of use schemes where new dwellings are created, will be expected to meet the requirements for accessible housing in London Plan Policy D7. That policy requires at least 10 per cent of dwellings to meet Building Regulations requirement M4(3) 'wheelchair use dwellings' and the remainder to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The policy explicitly states that this requirement is to provide suitable housing and genuine choice for London's diverse population including older people. This means that all new dwellings created in the borough (apart from those created through permitted development rights over which the Council as local planning authority has no control) must be accessible and adaptable, and 10 per cent will be wheelchair accessible.

In addition to this, DRLLP PSV Policy H8 addresses housing to meet specific community needs, which encompasses a wide range of groups in the population including older people, as explained in supporting paragraph 5.77. This policy will be applied in combination with London Plan Policy H13, part B of which

applies directly to development proposals. Therefore, where there is an explicit element of specialist older persons' accommodation in a proposal, this will be assessed under DRLLP PSV Policy H8 and London Plan Policy H13. These policies address the particular requirements of specialist older persons' accommodation, including provision of support and/or care where relevant, provision for visiting health and care professionals, design (having regard to relevant guidance on designing for older people as set out in supporting paragraph 5.80) and access to services and community facilities. Policy H8 also protects existing specialist accommodation.

Together, these policies set out how Lambeth as a plan-making authority will consider proposals for the different types of housing that older people are likely to require in accordance with the requirements of the PPG.

In the Council's view, DRLLP PSV Policy H8 is in general conformity with London Plan Policy H13 because:

- The Council has assessed need for older persons' housing in its SHMA 2017 as required by London Plan H13 A (1)
- The indicative benchmark figure has been included as a monitoring indicator (IND5) in the Monitoring Framework in Annex 8 of the draft Plan and will be reported on in the AMR, as required by London Plan H13 A (1) (and the PPG)
- H8 parts (a)(iv) to (vii) directly address London Plan H13 A (2)
- H8 part (d) requires applicants to demonstrate how the design will address the needs of people with dementia (and indeed other long-term health conditions), with further explanation and guidance provided in supporting paragraph 5.80, which addresses London Plan H13 A (3)
- H8 acknowledges and cross-references to London Plan H13, part B of which will be applied directly to development proposals.
- The Mayor raised no concerns about the general conformity of this policy in his opinion dated 13 March 2020 ([R054](#)).

It should be noted that housing for older people was one of the ten topics specifically identified in the issues consultation (Regulation 18 part 1) as part of preparation for the partial review of the Lambeth Local Plan. See further information in the [Issues consultation report October 2018](#) (SD15, plus appendices at SD15a and SD15b).

The Council's emerging Site Allocations DPD provides a further opportunity to consider potential for provision of older persons' housing on a site-specific basis.

5.9 Policy H10, which addresses **gypsy and traveller accommodation**, again appears not to be in general conformity with the London Plan policy H14 expectation for 7 pitches in Lambeth over the plan period. What is the Council's justification for providing a reduced figure of 4 pitches?

Council response

The Secretary of State's (SoS) letter to the Mayor of 13 March 2020 ([SD03a](#)) directs the Mayor to accept the recommendations of the London Plan examination panel and amend London Plan policy H14, because it is inconsistent with national policy set out in the Planning Policy for Traveller Sites (PPTS) (August 2015). The direction on this policy (DR7 in the annex to the SoS letter) deletes the Mayor's proposed wider definition of gypsies and travellers, so that the definition to be used is consistent with that in Annex 1 of the PPTS. In addition to deleting the Mayor's proposed definition, the direction amends sections C and D of the policy – which are the sections explaining how boroughs should assess need for gypsy and traveller accommodation.

The resulting wording differentiates between boroughs that have undertaken a needs assessment since the London-wide assessment of 2008, and those that have not. If none has been undertaken, boroughs should use the figure of need in Table 4.4 of the London Plan (which in the case of Lambeth is 7 pitches). However, Lambeth has undertaken a needs assessment since 2008. This was updated in 2016 to be consistent with the update to the PPTS, as stated in paragraph 5.96 of the DRLLP PSV January 2020.

The Council's assessment finds a need for 3 additional pitches as set out in the following documents: [Assessment of Gypsy and Traveller accommodation need in Lambeth - Bringing together the evidence \(October 2017\)](#) (EB11), [LB Lambeth Gypsy and Traveller and Travelling Showpeople Accommodation Assessment \(June 2014\)](#) (EB12) and [LB Lambeth Gypsy and Traveller Accommodation Assessment Update September 2016](#) (EB13).

5.10 Some of the housing policies appear to contain **high levels of complexity**; they seem very prescriptive, setting layers of conditions and in places they appear to lack flexibility. The Secretary of State's letter complains that the London Plan has set out a level of complexity that will reduce the appetite for development further and slow down the system and is also critical of rent caps. Several representors responding to your proposed submission version of the Lambeth Plan are making similar comments, especially in relation to policies H5 (Housing standards), H11 (Estate regeneration), H12 (Build to rent) and H13 (Large scale purpose-built shared living). Given the likelihood that the Intend to Publish London Plan will revisit these issues, it would be helpful for the Council to assess its policies in the light of the Secretary of State's letter and

consider whether any of these policies need to be simplified and/or made more flexible.

Council response

The Council does not agree that it is likely the Intend to Publish London Plan will revisit the issues identified in this question as a result of the Secretary of State's (SoS) letter ([SD03a](#)). Whilst the SoS's covering letter expresses a range of views on a number of matters, the scope of his directions to the Mayor is much narrower and confined to the eleven elements listed in the Annex to the letter. None of these eleven directions relates to housing standards, estate regeneration, Build to Rent, or large-scale purpose built shared living. The SoS also places a requirement on the Mayor to embark on an immediate review of the London Plan, but this will result in a new document rather than further amendments to the Intend to Publish version. The Mayor's response to the SoS dated 24 April 2020 ([SD03b](#)) does not indicate an intention to change any part of the Intend to Publish London Plan other than those elements affected by the eleven directions.

The Council has assessed all its policies in light of the SoS directions and, where changes are considered necessary, these are dealt with in the Statement of Common Ground between the Council and the Mayor dated 21 May 2020 ([SCG01](#)).

The Council also does not agree that there is a high level of complexity or a lack of flexibility in its housing policies. The policies have been designed to work alongside the London Plan policies, which in some cases have to be applied directly to development proposals. The overall approach in the drafting of the DRLLP PSV has been to cross-refer to London Plan policies where relevant, rather than to repeat those policies; and to make clear where London Plan policies must be applied directly in combination with Local Plan policies.

In some instances, the DRLLP PSV housing policies add Lambeth-specific approaches to deal with local circumstances and/or because this is required by London Plan policy. Justification is provided in the supporting text and evidence base.

The rationale and justification for the Lambeth-specific elements of policy in DRLLP PSV H12 (Build to rent) and H13 (Large scale purpose-built shared living) are explained in Topic Paper 9: Particular types of housing ([TP09](#)).

In the case of H5 Housing standards, the requirements for internal space and play space simply cross-refer to London Plan requirements. The policy does include Lambeth-specific external amenity space standards, which is a long-standing position in Lambeth and is already adopted in the Lambeth Local Plan.

The changes to the external amenity space standards proposed in DRLLP PSV Policy H5 introduce *more* flexibility rather than less, for example through the

inclusion of the word “generally” in part (b)(i) and by removing the requirement for communal amenity space in flatted developments with fewer than 10 units in part (b)(ii). Further flexibility also exists and has been added to in paragraph 5.50. The only other change is to introduce clarity on the requirements for non-self-contained accommodation (part (b)(iv)) because this is not dealt with in the current Local Plan, which has caused confusion at the level of decision-making. This part of the policy is uncontested in Regulation 20 representations. Further information about the considerations around external amenity space standards is provided in Topic Paper 2: Housing delivery of small sites – see pages 46-47 ([TP02](#)).

The Council notes that there are only two objections in total to Policy H5 (R035 and R068). The Council’s response to these objections is set out on page 81 of the Regulation 22 Consultation Statement ([PD06](#)).

Turning finally to Policy H11 Estate regeneration, this policy has been introduced to deal with the particular circumstances that affect this specific type of development, which is typically very complex. The intention in this policy is specifically to provide flexibility and allow for a different approach where justified than would otherwise be the case under other Local Plan policies on housing. For example, part (c) allows for a different approach to tenure split than would normally be required (above replacement provision), where clearly justified. Similarly, part (d) allows for a case by case approach to dwelling size mix, where justified. Part (f) makes clear that particular circumstances affecting estate regeneration schemes may justify a different approach to external amenity space than would normally be required under Policy H5. Other than this, the requirements of the policy address the requirements of London Plan Policy H8.

The Council’s response to the objections raised to Policy H11 is set out on pages 82-83 of the Regulation 22 Consultation Statement ([PD06](#)). Having considered the comments received, the Council has accepted the need to add clarity and this has resulted in four potential changes to the wording of the policy and supporting text. These are listed as PC019, PC020, PC021 and PC022 in the Schedule of Potential Changes ([SD17a](#)).

6. Economic development

6.1 Concern has been expressed in representations that policy ED2, which seeks to promote **affordable workspace**, is in fact doing the opposite. I understand that a key reason for this is because refurbishment projects play a significant part in delivering much needed office floor space in Lambeth (one survey has put the figure at 42% in the Southbank area and around one third overall in the Borough). The suggestion from several representors is that the policy could be found sound by only requiring affordable workspace to be provided on any net increase in floor space, rather than on the overall total of

floor-space, so as not to frustrate the overall delivery of workspace and subsequently affordable workspace. If the Council is minded to continue to propose the existing submitted policy, I require a **statement which looks at the robustness of the reasoning behind the policy**, including the viability implications.

Council response

Policy (ED2) promotes the provision of affordable workspace to be made available for SMEs, not for profit or charitable sectors, and to support the creative and digital and other key local economic sectors within the borough. Topic Paper 3 on Workspace ([TP03](#)) (see section 5) sets out how ED2 has been developed within the aims and context of Policy E3 of the Draft London Plan (DLP), and is supported by evidence of need and viability.

Policy ED2 will apply to applications for redevelopment and refurbishment of office floor-space only in parts of the borough where the provision of 10 per cent affordable workspace has proven viable through the Local Plan and CIL Viability Review 2019 ([EB97](#)) and the Brixton CEZ Affordable Workspace Analysis 2018 ([EB98](#)). Other parts of the borough will not be required to provide affordable workspace through B1a office developments.

Policy ED2 is proposed to apply to all developments in identified parts of the borough containing over 1,000sqm or more gross B1a floor space, but will also include applications for refurbishment "*where this would result in an increase in the quality and rental value of the space*" (see paragraph 6.14 of the DRLLP PSV). Although it is considered that development proposals would generally aim to increase the quality and rental value of office space, if this were not the case, then the scheme would not be required to provide affordable workspace on the whole of the floor-space, and would only apply to the uplift (where above the threshold).

Paragraphs 6.2 to 6.7 of the Local Plan and CIL Viability Review 2019 ([EB97](#)) set out the results of viability testing of three different discounts on 10 per cent of B1a floor-space within qualifying developments. Table 6.3.1 sets out the results for each of the three CIL Charging Zones, demonstrating more considerable viability implications within Zone C. For Zones A and B it demonstrates that a discount of 20 per cent from market rent for a 15 year period has lower viability impacts, but it may be possible to increase the discount to 50 per cent in the highest value parts of the borough. These results have been directly reflected within Part (a) (i) and (ii) of ED2 whereby the requirement for affordable workspace only applies in CIL Charging Zones A and B.

The enhanced provision of affordable workspace are key outcomes and aspirations of the Creative Enterprise Zone programme, therefore for Brixton, which falls within Charging Zone C (which would otherwise be exempt from this

requirement), further fine-grained viability testing has taken place within the Brixton CEZ Affordable Workspace Analysis 2018 ([EB98](#)). This found that the maximum viable discount on appropriate office developments differed throughout the CEZ but all the proposed levels of discount are unlikely to adversely impact scheme viability (see EB98, Table 6.1.7). This has been reflected in part (a) (iii) of the policy.

The viability testing applied the above discounts to the whole of the proposed office floor-space within schemes and did not distinguish between refurbishment or rebuild. It is considered that a scheme consisting of a greater proportion of refurbishment of floor-space would generally have lower build costs (see paragraph 4.13 of EB97 for build costs applied) and the scheme as a whole may therefore generally be more viable if it were to contain refurbishment of space. Therefore, refurbishment schemes may in fact under some circumstances be able to absorb a greater proportion of affordable workspace. As a result, the 10 per cent of floor space to be provided at the proportion of market rates set out in part (a) is generally viable for all forms of office developments within the borough. However there is an appropriate level of flexibility built into the policy to allow for particular site specific circumstances through the viability clause at part (f). Part (e) also allows for a payment in lieu under certain circumstances and further detail is also set out within paragraph 6.15 of the supporting text.

This above approach is designed to capture the maximum benefits of the policy approach but also to reflect the types of schemes coming forward within the borough. As referenced in the Inspector's question, refurbishment schemes play a significant part in delivering the significant demand for office floor space within the borough over the plan period (see Figure 9.8 within the London Office Policy Review ([EB20](#)) and given the historic levels of loss to residential under permitted development rights identified within Topic Paper 3 Workspace ([TP03](#)) (see paragraph 2.3). Given this context, failure to apply the affordable workspace requirements would risk adversely impacting on the provision of affordable workspace and the borough's wider aspirations within the Borough Plan ([EB01](#)), the Creative and Digital Industries Strategy ([EB25](#)), and the Brixton Creative Enterprise Zone Research Study 2018 ([EB27](#)). This approach is also appropriate given that approximately 30 per cent of the borough is covered by Conservation Area designations where the refurbishment of an office building may be more appropriate on conservation grounds.

6.2 Concern has been expressed in relation to policy ED3 (Key Industrial and Business Areas (KIBAs)) regarding the deletion of the business element from the definition of the **Key Industrial and Business Areas** (KIBAs). Given the problems of stock availability and higher rents for small and medium enterprise (SME) uses, and the evidence pointing to some SMEs failing in the Borough,

[what is the justification for the change in policy ED4 from the adopted Plan version of the policy?](#)

Council response

The Council assumes this question is intended to relate to Policy ED3 KIBAs, rather than ED4.

The word 'business' has been deleted from section (a) of Policy ED3 in direct response to the Mayor's London Plan and the need to be in general conformity with his approach on industrial land. This deletion was intended to provide clarity that additional class B1a space would not generally be supported in KIBAs (as explained in supporting paragraph 6.30). Indeed, new office space is directed to town centres by policy ED1, at the request of the Mayor, and none of Lambeth's KIBAs is in a town centre. Please refer to the Mayor's opinion on general conformity ([R054](#)) and the subsequent Statement of Common Ground agreed between Lambeth and the Mayor in May 2020 ([SCG01](#)), particularly the proposed changes to Policy ED1 (proposed as potential change PC024 in the Schedule of Potential Changes ([PD17a](#))).

Use classes B1b and B1c are encouraged in KIBAs and fall within the Mayor's definition of 'industrial' (London Plan policy E4), which continues to be referenced in DRLLP PSV Policy ED3. Further evidence and justification for the approach in KIBAs is provided in the Lambeth Review of KIBAs May 2020 update ([EB24](#)).

6.3 Jobs for local residents: Whilst many representors share some sympathy with the overall objectives of the Council in seeking to secure local jobs for local people, concern has been expressed for the requirement in policy ED15 for a minimum of 25% of all jobs created by development is to be secured for local residents. Where does this figure come from? How realistic is it in relation to the relatively low unemployment rates in both Lambeth and Greater London? Where is its justification in relation to *the Framework* and PPG? How can this policy be squared with London's position as a global city which attracts talents from all over the world?

Council response

NPPF paragraph 80 requires planning policies to help create conditions in which businesses can invest, expand and adapt and states that "The approach taken should allow each area to build on its strengths, *counter any weaknesses* and address the challenges of the future" (emphasis added). Paragraph 81 adds that planning policies should have regard to other local policies for economic development and regeneration.

Paragraphs 2.18 to 2.28 of the DRLLP PSV provide a high-level summary of the strengths and weaknesses of the Lambeth economy, with reference to the Lambeth Investment and Opportunity Strategy 2015 ([EB22](#)). This highlights that at the time of writing – during a period of economic growth - there were over 7,500 working age residents claiming benefits in Lambeth principally for the reason of being unemployed, with a further significant number claiming incapacity benefit and almost 10 per cent of Lambeth working age residents qualified at NVQ level 1 or below. It also refers to a quarter of job vacancies in Lambeth in 2015 being hard-to-fill due to skill-shortages, above the London and England averages at the time. These data led to the identification of five priorities in the Investment and Opportunity Strategy 2015, four of which directly relate to directing the benefits of economic growth to local people: Priority One – accelerate and shape growth to benefit local people; Priority Two – develop skills provision to meet employer needs; Priority Three – equip young people for the economy of the future; and Priority Four – provide personalised employment support for people with complex needs. These issues are reflected in the State of the Borough Report 2016 ([EB02](#)) and the priorities are carried forward into the council's Borough Plan, updated in 2019 ([EB01](#)).

These priorities are reflected in the vision and strategic objectives of the DRLLP PSV and Policy ED15 directly responds to these local economic development priorities by providing a mechanism to channel the benefits of growth to local people. The approach is also fully consistent with London Plan policy E11, which requires boroughs to ensure the greatest possible level of take-up by Londoners of the training, apprenticeship *and employment* opportunities created through the use of planning obligations.

The rationale for Policy ED15 is further explained in the supporting text of the policy, particularly paragraphs 6.111 to 6.114.

The figure of 25 per cent of jobs to be secured for local residents is derived from evidence in the 2011 Census ([EB02](#)), which found that there were 138,200 jobs in Lambeth, of which 34,700 were people living and working in Lambeth. This represents just over 25 per cent of the total number of jobs in Lambeth being taken by Lambeth residents. If the number of people with no fixed place of work are removed from the number of jobs, this proportion increases to 30 per cent. The Census 2011 provides the most recently available information about where Lambeth residents work (the Census is only updated once every ten years).

As a basis for the approach in Policy ED15, 25 per cent is considered to be a reasonable figure whether unemployment in Lambeth and London is high or low. The 25 percent jobs target is not restricted to people who were previously unemployed but is a wider target to reflect a desire to ensure that local people benefit from economic growth by having access to local job opportunities created through new developments. A period of high unemployment, such as we are now experiencing, may suggest there is a large and growing pool of local people

looking for work locally. However even in periods of low unemployment there are residents who are in work but keen to look for work that is closer to home.

The minimum 25 per cent figure is a target and the council would expect developers to use reasonable endeavours in order to achieve the target, as is made clear in clause (b)(iii) and in the supporting text of the policy (paragraph 6.118). The target is not designed to be punitive, but instead to reflect the ambitions of securing more local jobs for Lambeth residents, including apprenticeships. The developer would be expected to demonstrate that they have used reasonable endeavours to recruit local people through activities such as notifying the council of job vacancies, working with local training providers and engaging with local jobs fairs or recruitment events.

Lambeth is proud to be a welcoming home to people from around the world. The borough has comparatively high rates of inward migration from elsewhere in the UK and outside the UK due to the vibrant culture and being part of central London. Population turnover in the borough is high, estimated about approximately 23 per cent every year (see DRLLP PSV paragraph 2.8). People who are living in Lambeth but have moved to the borough from elsewhere would still count towards the 25 per cent local labour target – there is no restriction on the length of time someone needs to have been resident in Lambeth to count towards the 25 per cent.

The policy includes flexibility to allow for alternative means of delivery where the developer can demonstrate scheme specific circumstances and a more effective outcome, allowed for in part (b)(iii) of the policy and explained in paragraph 6.120.

This approach is already in operation through the Lambeth Employment and Skills SPD ([SD23](#)) adopted in 2018 as SPD to the current Local Plan 2015. It is working successfully and the 25 per cent target has been successfully secured in a number of signed s106 agreements for approved developments in the borough (see Appendix 2 of this response), demonstrating it is a reasonable and deliverable approach and one that a range of developers of different types and sizes of scheme in Lambeth are willing to accept. The provisions of the adopted SPD have been incorporated into the DRLLP PSV in order to address the requirements of Planning Practice Guidance paragraph 004 Reference ID: 23b-004-20190901 on where policy on planning obligations should be set out. The provisions have been factored into the whole plan viability assessment – see Local Plan and CIL Viability Review 2019 ([EB97](#)) (paragraphs 1.7, 2.43, 4.27, 6.25, 6.26, and 7.2 and pages 86-87).

The Council has proposed a clarification to paragraph (b)(i) of Policy ED15 and supporting text paragraph 6.117 to make clear that the 25 per cent target for end use employment would only be expected to be created from new roles arising from the development. This is set out in the Council's Regulation 22

Consultation Statement (page 94) ([PD06](#)) and in the Schedule of Potential Changes ([PD17a](#)) - references numbers PC041 and PC042 on page 14.

7. Environment issues

7.1 Concern is expressed by the GLA that the **waste policies** require further clarification as to how the Borough proposes to achieve overall net self-sufficiency in this important area. It would be helpful to have a **statement from the Council as to how it intends to address the gap in capacity**, which the GLA puts at 143,000 tonnes up to 2021 and 152,000 tonnes by 2041. I understand that one way to address this is through the intensification of existing waste sites. The Council's statement should include an explanation as to how it proposes to address this issue, including any suggested changes to policy EN7.

Council response

Lambeth's waste policy EN7 is supported by a Waste Evidence Base (updated April 2020) ([EB55](#)) which sets out how much waste Lambeth needs to plan for over the plan period, existing capacity in the borough, and the capacity gap which is the difference between the two.

Chapter 4 of the Waste Evidence Base identifies waste need. In line with National Planning Policy for Waste 2014 (NPPW), Lambeth is required to plan for seven waste streams. The largest of these are Local Authority Collected Waste (LACW), Commercial & Industrial Waste (C&I) and Construction, Demolition and Excavation Waste (CD&E). The London Plan apportions an amount of LACW and C&I waste to each borough and Lambeth is required to have regard to these apportionment targets (London Plan policy SI8 and Table 9.2).

The London Plan also aims for net self-sufficiency for all waste streams, except excavation waste, by 2026. For Lambeth, 'net self-sufficiency' means providing enough waste capacity to manage the equivalent amount of Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste apportioned by the London Plan, and the equivalent amount of Construction and Demolition (C&D) waste generated in Lambeth. As a result of comments from the Mayor, the Council has proposed a potential change to Policy EN7(a) (new clause under (i)) to include an explicit commitment to contribute to the Mayor's target for London's waste capacity and net self-sufficiency by identifying sufficient capacity and land to meet Lambeth's identified waste needs, including the borough's apportionment target. This is set out in the Statement of the Common Ground between Lambeth and the Mayor ([SCG01](#)) (see Myr 17 on page 11, and proposed changes in red on page 27) and is also listed in the Schedule of Potential Changes ([SD17a](#)) under reference PC073.

Net self-sufficiency takes account of the fact that some imports and exports will continue. Imports and exports will always happen because of contracts for waste management and because it is not possible for Lambeth to accommodate the full range of facilities required to manage all of the waste generated in the Borough (that would be self-sufficiency, not net self-sufficiency).

Chapter 2 of the Waste Evidence Base identifies existing capacity in Lambeth, Chapter 4 identifies the future waste management need in the borough, and the capacity gaps between the two. This is summarised in Tables 4.4 and 4.5 of the Waste Evidence Base, and repeated below for ease of reference. The tables show there is a capacity gap in Lambeth for both apportioned (LACW and C&I) waste and C&D waste.

Table 4.4: Capacity gap for Draft London Plan apportionment targets (tonnes)

Borough	Current capacity	2021	2026	2031	2036
Apportionment		143,000	145,000	147,000	150,000
Capacity	56,700	56,700	56,700	56,700	56,700
Capacity gap		-86,300	-88,300	-90,300	-93,300

Table 4.5: Capacity gap for CD&E waste (tonnes)

Borough	Current capacity	2021	2026	2031	2036
Identified need		78,938	82,244	85,575	88,931
Capacity	47,000	47,000	47,000	47,000	47,000
Capacity gap		-31,938	-35,244	-38,575	-41,931

Table 4.6 indicates how much land is required in Lambeth to meet this capacity gap. The land take is indicative only because different types of waste facilities need different size sites. The amount of land required is approximately 2ha. The fact that this figure is indicative is clarified through a proposed change to EN7 supporting paragraph 9.68. This is agreed in the Statement of Common Ground between Lambeth and the Mayor [SCG01](#); and is also listed in the Schedule of Potential Changes ([SD17a](#)) under references PC077.

Waste planning authorities are required by the NPPW to “prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams.” The London Plan identifies existing waste facilities and designated industrial land as a focus for new waste sites and facilities, and this approach is taken forward into DRLLP PSV Policy EN7.

Most existing waste sites in Lambeth are operating at a typical throughput for the type of facility and waste stream. However, there is potential to intensify or upgrade a few wastes sites in Lambeth and these are identified in the Waste Evidence Base. As a result of comments from the Mayor, potential changes to Policy EN7(a) have been agreed in the Statement of Common Ground (see [SCG01](#)) to include encouragement for the intensification of capacity on existing sites (criteria iii and para 9.67); also listed in the Schedule of Potential Changes ([SD17a](#)) under references PC074 and PC076.

No individual sites for waste came forward through the call for sites process carried out by Lambeth in 2015 or through the Local Plan review issues consultation in 2017. This is not unusual; most waste planning authorities are in a similar position and are taking an area-based approach to waste planning. This approach is supported by both the NPPW and the London Plan. An area-based approach is to identify areas, usually industrial areas, which are suitable for new waste development.

Key Industrial Business Areas (KIBAs) represent Lambeth's main stock of designated industrial land. The Waste Evidence Base assesses each of the KIBAs and proposed new KIBAs for its suitability for waste uses. A total of 41.75ha within the KIBAs is suitable for waste uses which represents "sufficient opportunities to meet the identified needs of their area for the management of waste streams" as required by the NPPW. As a result of comments from the Mayor, a potential change to Policy EN7 supporting paragraph 9.69 has been agreed in the Statement of Common Ground ([SCG01](#)) to include a recognition that "Waste management and recycling facilities are one of the priority uses for Lambeth's industrial land"; this is also listed in the Schedule of Potential Changes ([SD17a](#)) under reference PC078.

Lambeth is therefore proposing to contribute to London's net self-sufficiency target by encouraging the intensification of existing waste sites and identifying locations suitable for new waste facilities.

It is not possible to guarantee that Policy EN7 will deliver new waste capacity in Lambeth to meet the capacity gap over the plan period. This is because Lambeth is relying on the market to deliver new waste facilities (facilities and contracts to manage Local Authority Collected Waste are already in place). This is the same for most other London Boroughs and also for waste planning authorities outside of London. However, Lambeth is not required to deliver new waste capacity, but to "prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams" (NPPW).

Lambeth recognises that the GLA are concerned about how the London Plan's aim for net self-sufficiency will be achieved. Many London Boroughs are taking the same area-based approach to waste planning, with more to follow, so this is an issue the GLA will need to monitor.

As part of this, Lambeth has agreed a further proposed change with the Mayor to the supporting text of Policy EN7 stating that "Monitoring indicators IND24, IND25 and IND26 will report on new waste capacity, loss of waste sites and compensatory capacity, and waste exports. Where monitoring demonstrates that waste management capacity to meet the apportionment target is unlikely to be achieved by 2026, in line with the London Plan net self-sufficiency target, the council will work with the GLA to proactively engage with operators to encourage delivery of additional waste management capacity in the borough." See [SCG01](#); also listed in the Schedule of Potential Changes ([SD17a](#)) under reference PC079.

The GLA state in the Statement of Common Ground agreed between the Mayor and Lambeth on 21 May 2020 that:

"The Mayor welcomes the recent collaborative working on this matter and the positive policy commitment from Lambeth to contribute towards the Mayor's ambition that London be self-sufficient in its management of waste and to provide the capacity to meet its waste apportionment targets as now set out in draft Policy EN7. He also welcomes that Lambeth will encourage the intensification of capacity on existing sites, where appropriate. The amendments proposed by Lambeth provide clarity on the monitoring of waste management capacity and the actions to be taken should that monitoring indicate that the apportionment is unlikely to be met, which is strongly supported.

GLA officers note the borough's current shortfall in its capacity to meet its apportionment targets and are happy to continue working constructively with Lambeth to help monitor and seek solutions to meeting apportionment should capacity not come forward during the life of the plan." ([SCG01](#) page 2)

7.2 Policy EN3 setting out requirements for **decentralised energy would already appear to be outdated in relation to current practice; in any event, what is the justification for retaining this policy?**

Council response

The justification for retaining policy EN3 is to be in general conformity with London Plan policy SI3 on energy infrastructure. Paragraph 9.3.2 of the London Plan (under policy SI3) states "Decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs".

Policy SI3 was discussed during the examination in public of the London Plan. The Mayor's response to Matter 67 ([SD21](#)) provides a justification for the

provisions in policy SI3 relating to major development proposals within Heat Network Priority Areas at paragraphs 67.20 to 67.22.

The London Plan Examination Panel report ([SD03c](#)) concludes in relation to Policy SI3 policy SI3 that:

"Policy SI3 contains provisions relating to energy masterplans for large scale development locations and given their scale this approach is justified and the list of matters to be covered is comprehensive. It also sets out a heating hierarchy for major development proposals within Heat Network Priority Areas. Based on the latest evidence it is reasonable to order the different types of communal low-temperature heating systems in this way rather than presenting them as a 'menu' to select from. Equally it is wise not to expressly rule out options such as combined heat and power under certain circumstances given that technology may change over the period of the Plan. Therefore the sequence and content of the heating hierarchy is justified. The policy also sets a framework for boroughs to identify opportunities for expanding or establishing new networks." (paragraph 473)

Aside from referencing good practice design and specification standards for new and existing networks, no changes were made to policy SI3 as a result of the examination.

DRLLP PSV policy EN3 and London Plan policy SI3 are also consistent with NPPF 2019 paragraphs 148, 151 and 153(a). Paragraph 153(a) specifically references development plan policies on local requirements for decentralised energy supply.

The Government's proposed Future Homes Standard ([SD22](#)), which proposes an uplift to standards in Part L of the Building Regulations and changes to Part F and was published for consultation between October 2019 and February 2020, states:

"Heat networks (sometimes referred to as district heating) are a distribution system that takes heat from a centralised source and delivers it to a number of different buildings. These heat networks also form an important part of our plan in the future of low carbon heat, in particular in cities and high-density areas. Heat networks can decarbonise more easily compared to most other heat sources because new technologies can be added to the system with little disruption to individual householders. They provide a unique opportunity to exploit larger scale, renewable and recovered heat sources that can't be accessed at an individual building level. Heat networks also provide system benefits such as thermal storage and reducing the energy demand of the grid at peak times. It is estimated by the CCC that around 18% of UK heat will need to come from heat networks by 2050 if the UK is to meet its carbon targets cost-effectively. We expect that heat networks will have a strong role to play in delivering low carbon heat to new homes in future." (paragraph 2.12)

Therefore, in the Council's view the requirements for decentralised energy in Policy EN3 are not out of date and are entirely consistent with current practice, justified, in general conformity with the London Plan and consistent with national planning policy.

Appendix 1 – Evolution in sustainability appraisal of reasonable alternatives since 2008

Core Strategy Issues and Options April 2008

Sustainability Appraisal and SEA of London Borough of Lambeth LDF Core Strategy Issues and Options Assessment Briefing Paper, December 2008

What was appraised

Appraisal of draft vision, strategic objectives and initial options to achieve those objectives. The SA examined the sustainability effects of the issues and options put forward for consideration and a briefing paper provided recommendations as to how to develop the draft Core Strategy in a sustainable manner.

Outcomes of appraisal

The following is a summary of the key policy changes which resulted from the appraisal of the Issues and Options document:

Vision and strategic objectives: These were improved by taking on board many of the comments made by the SA, e.g. in relation to climate change, transport capacity, housing quality and provision of infrastructure (including schools). For appraisal matrices see pages 24-31 of

https://www.lambeth.gov.uk/sites/default/files/pl_Sustainability_Appraisal_Appendix_6_SA_Issues_and_Options_Assessment_Briefing_Paper_December_2008.pdf

Climate change: The policy and content was strengthened and extended to address adaptation issues. The role of transport as a key carbon emission source was emphasised.

Energy: A more comprehensive approach encompassing energy efficiency, renewable energy generation (including on site) and new energy centres and networks.

Water and flooding: Issues of water demand, water infrastructure and flooding were addressed.

Sustainable design and construction: The importance of encouraging the highest standards of sustainable design and construction for new build was taken on board.

Social infrastructure: More emphasis was given to the range of key social facilities and services required for sustainable communities and neighbourhoods to prosper and to keep pace with growth, including health care, school places, open spaces etc.

Public transport capacity: More attention was given to the need to ensure that public transport capacity keeps pace with development, and the role that developers have in meeting needs.

As a result of SA recommendations, the number of strategic objectives increased from 12 to 18 in the preparation of the Draft Core Strategy.

Link to SA document

Examination library ref: PD03i

https://www.lambeth.gov.uk/sites/default/files/pl_Sustainability_Appraisal_Appendix_6_SA_Issues_and_Options_Assessment_Briefing_Paper_December_2008.pdf

Draft Core Strategy April 2009

Sustainability Appraisal and SEA of London Borough of Lambeth LDF Core Strategy

Sustainability Appraisal Report, March 2009

What was appraised

Appraisal of the Preferred Options policies – a set of core policies and a series of area-based policies.

The strategic options, the vision and strategic objectives of the Core Strategy were also reappraised, following changes made and new strategic objectives introduced since the Core Strategy Issues and Options was consulted on.

Outcomes of appraisal

60 recommendations were made in the SA Report and amendments to the Core Strategy were made accordingly: Some key changes included:

- References to London Plan Areas of Regeneration were added;
- The vision and objectives were revised regarding ethnic and faith groups;
- Added references to ensure development is designed to take account of the impacts of climate change over its lifetime;
- Revisions to ensure that community facilities that attract large numbers of people are located in town centres, where levels of public transport accessibility are ‘good’ or above;
- Improvements in relation to protection of biodiversity in new development, plus the incorporation of ecological features into the public realm;
- Greater support for the waste hierarchy and in particular the efficient use of resources, the reuse of materials and resources, and the recovery of energy from materials, plus support for the re-use of buildings and building materials;
- Ensuring that improvements to the quality of the public realm are child-friendly and encourage physical activity;
- Ensuring that safe and attractive pedestrian and cycle routes within and through neighbourhoods are linked to green spaces and public transport nodes and interchanges;
- Seeking opportunities to create and link existing spaces through green chains, the Greenway and Thames Path National Walking Trail initiatives.

Core Strategy Submission Version March 2010

Sustainability Appraisal and SEA of London Borough of Lambeth Submission Core Strategy, Sustainability Appraisal Report, August 2009

What was appraised

The vision, strategic objectives and policies were reappraised for the Core Strategy Submission Version. The Core Strategy objectives were also tested for compatibility with the SA objectives.

Outcomes of appraisal

Recommendations were made in this SA Report; many of which were matters to be addressed in then forthcoming Development Management DPD. However, the Development Management DPD did not proceed but was subsumed within the new all-in-one Lambeth Local Plan (which included strategic policies, development management policies and site allocations). The SA recommendations made at this stage were therefore taken into account in the preparation of the draft Lambeth Local Plan February 2013.

Link to SA document

<https://www.lambeth.gov.uk/sites/default/files/Appendix7SALambethCoreStrategy2009.pdf>

Draft Lambeth Local Plan, February 2013

Sustainability Appraisal: Draft Local Plan for Lambeth, February 2013

What was appraised

Appraisal of draft Lambeth Local Plan policies (including site allocations) which brought together the strategic policies in the adopted Core Strategy with new development management policies and site allocations into one document. The appraisal work also included SA analysis on reasonable alternatives.

Draft Local Plan objectives were appraised in this SA for completeness (they were unchanged from the Core Strategy). Assessing the relationship between SA objectives and the high level strategic objectives helped identify whether the spatial vision for Lambeth was in accordance with sustainability principles, which it was found to be.

Reasonable alternative approaches were considered in formulating the draft Local Plan particularly for those policies that differed from adopted Core Strategy policy and some new development management policies, and these were set out in the Topic Papers. These broadly included the following areas: affordable housing, housing mix, student housing, KIBAs, business uses outside KIBAs, railway arches, town centres, night-time economy and food and drinks uses, A2 uses, hot food takeaways near schools, skills and training, schools, food growing spaces, low carbon and energy, and waste management. This SA appraised the reasonable alternatives identified for these areas, the outcomes of which fed into the next plan making stages. For more info see pages 11-19 of this link:

<https://www.lambeth.gov.uk/sites/default/files/Appendix5ReasonableAlternativesCoreStrategyandDraftLocalPlanSummary.pdf>

At this time there was factual updating of the strategy, vision, objectives and some policies; however the nature of this was not such that it fundamentally impacted on the policy approach or previous SA / SEA conclusions. Where there was no strategic change in approach to adopted Core Strategy policies, no additional work on reasonable alternatives was undertaken. Rather, reasonable alternatives for these policies were identified and assessed recently as part of the plan making process in adopting the Core Strategy and were deemed to be consistent with the NPPF 2012. Appraisal of

these reasonable alternatives was provided in the Sustainability Appraisal which influenced the adopted Core Strategy and it was considered in the preparation of the SA on the Draft Lambeth Local Plan Feb 2013 that such assessment remained valid and defensible. Accordingly, where policies remained unchanged from the Core Strategy, there were no further assessments of reasonable alternatives.

Outcomes of appraisal

Recommendations were made in this SA where appropriate to improve the sustainability effects of the draft Plan. In some cases resulted in a change of effect from negative to positive (for example flood defences need remain in good condition (original policy inadvertently allowed defences to get to poor condition)). Some recommendations saw an improvement to policy that resulted in a minor positive effect becoming a significant positive effect in the context of the SA Objective (for example, improvements in sustainable design and construction standards likely to result in better health outcomes; strengthened provisions for living roofs and walls, clarification that biodiversity generally should be protected rather than just identified areas with biodiversity status, and a net increase in trees which would likely result in significant effects of biodiversity as well as other SA Objectives such as health, liveability and sustainability of built environment. Recommendations were also included that improved clarity and interpretation of the draft Local Plan.

Link to SA document

<https://www.lambeth.gov.uk/sites/default/files/SustainabilityAppraisal2013maindocumentwithoutappendices.pdf>

Lambeth Local Plan Proposed Submission, November 2013

Sustainability Appraisal: Lambeth Local Plan Proposed Submission, November 2013

What was appraised

Appraisal of Lambeth Local Plan Proposed Submission policies, including an appraisal of Local Plan objectives for compatibility with the SA objectives.

Outcomes of appraisal

Recommendations were made in this iteration of SA, which were all considered in the preparation of the Proposed Submission Plan. Some changes included:

- That external amenity space is private
- Public health as a consideration for refuse and recycling storage areas
- Expectation that family housing is provided in housing proposals (remove word normally)
- Allow residential above ground-floor units rather than just above shops
- Effects of servicing sites should be managed for amenity of adjacent properties rather than only adjoining properties
- Effects of new taxi ranks should be managed for the wider environment amenity, rather than only residential amenity
- Flexibility to seek higher standards of sustainable design and construction in later stages of plan period
- Redress potential inconsistency between Conservation Areas and Brixton policy in terms of protecting historic frontages

- Encourage electric vehicles and charging points network across borough
- Ensure developments have capacity for adequate water supply as well as sewerage water capacity.

Link to SA document

Examination library ref: PD03g

https://www.lambeth.gov.uk/sites/default/files/pl_Sustainability_Appraisal_Appendix_4_Sustainability_AppraisalLambethLocalPlanProposedSubmissionNov2013.pdf

Consultation on issues for the partial review – 10 Topic Papers , October 2017

Sustainability Appraisal: Issues and Reasonable Alternatives, October 2017

What was appraised

The Lambeth Local Plan Review is a partial review of the Lambeth Local Plan 2015 and at this time focused on ten key topics: housing growth, affordable housing, housing for older people, self-build and custom house-building, business and jobs, town centres, hotels and visitor accommodation, improving air quality, waste and transport. Each topic had a range of issues that need addressing. All of the issues had a number of reasonable alternatives (options) attached to them that sought to tackle the issue. This SA appraised all of those options. The aim of this process was to assist in the selection of the preferred options.

Link to SA document

Examination library ref: PD03b

https://www.lambeth.gov.uk/sites/default/files/pl_Sustainability_Appraisal_Appendix_2_Issues_and_Reasonable_Alternatives_October_2017.pdf

Draft Revised Lambeth Local Plan, October 2018

Lambeth Local Plan Review, Sustainability Appraisal Draft Revised Lambeth Local Plan, October 2018

What was appraised

Despite only very minor changes proposed for the draft revised Local Plan objectives (related to updating, factual information) and that the objectives were appraised in the SA on the Lambeth Local Plan 2015 (and previously through the Core Strategy 2011, and remain largely unchanged); for totality the objectives were again assessed for compatibility against the SA objectives. Also, the draft Local Plan as a whole (i.e. the policies) were assessed against each SA objective.

This SA Report predicted and evaluated the significant effects of the policies in Draft Revised Lambeth Local Plan October 2018. Where appropriate, recommendations were made to reduce adverse effects and maximise beneficial effects.

Outcomes of appraisal

A total of 98 recommendations were made in the SA with the aim of improving the impact of policies on sustainability or reducing potential for negative effects. Many involved clarifying policy intent and/or tweaking wording to improve outcomes for sustainability objectives. There were a few recommendations that sought to ensure better safety and health outcomes for people in the borough (for example policies on estate regeneration, parking, urban design, walking, cycling and Clapham). There were recommendations that sought to include more references to air quality for a range of policies (for example policies on open space, trees, landscaping and places and neighbourhoods).

Link to SA document

Examination library ref: PD03k

https://www.lambeth.gov.uk/sites/default/files/pl_Sustainability_Appraisal_including_Non_Technical_Summary_Draft_Revised_Lambeth_Local_Plan_October_2018.pdf

Draft Revised Lambeth Local Plan Proposed Submission Version January 2020

Sustainability Appraisal Draft Revised Lambeth Local Plan Proposed Submission Version January 2020

What was appraised

Same appraisal process as above for the SA on Draft Lambeth Local Plan October 2018.

This SA Report predicted and evaluated the significant effects of the policies in the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020. Where appropriate, recommendations were made to reduce adverse effects and maximise beneficial effects.

Outcomes of appraisal

A total of 14 recommendations were made in this SA on the DRLLP PSV 2020 with the aim of improving the impact of policies on sustainability or reducing potential for negative effects. Many recommendations involved strengthening policies with regards to accessibility and inclusiveness. For example, policy H5 reinforcing requirements for *accessible* housing; and that children's play space should be *inclusive* as well as accessible. Policy T1 - that development should contribute towards improvement of *inclusive* access to public transport; that Lambeth will seek better *accessibility* in public transport (policy T4); and that new social infrastructure buildings and facilities are designed to promote *social inclusion*. Other recommendations included ensuring family-sized units are considered for the housing mix of market housing provision; better providing for actual usability of external amenity space; encouragement to exceed minimum internal space standards; clarification that London Plan guidance and standards apply relating to design and quality of housing; recognition of the social value of markets; and the importance of planning for safety, crime prevention and counter terrorism in visitor attractions, leisure, arts and cultural uses. Recommendations were also made regarding climate change and carbon emissions (policy EN4 and Q18). Positively all 14 recommendations were incorporated into the Draft Revised Lambeth Local Plan Proposed Submission Version Jan 2020.

Link to SA document

Examination library ref: PD03 https://www.lambeth.gov.uk/sites/default/files/pl_SA_DRLLP_PSV_2020.pdf

Appendix 2 – Planning permissions with signed s106 agreement incorporating the provision for 25 per cent local labour (agreed under the Local Plan 2015 and Employment and Skills SPD 2018)

Site Address	Planning Ref	Description of development	Current status of scheme
St Thomas' Hospital 249 Westminster Bridge Road London SE1 7EH	19/01397/FUL	Demolition of existing single storey hospital building and erection of a new six storey (including plant level) hospital building (C2 use), alterations to existing access arrangements and associated public realm works.	Under construction
22 Wyvil Road	17/02874/FUL	Demolition of the existing buildings and erection of 9 storeys building with basement level comprising commercial use (Use Class B1) at basement and ground floors and 30 residential units (Use Class C3) on the upper levels, together with landscaping and public realm, communal terrace at roof level, ancillary servicing and plant, 47 cycle parking spaces and associated works	Under construction
55 Union Grove	18/00968/FUL	Demolition of existing building and erection of 2 no. four storey buildings to provide 11 self-contained flats, together with the provision of waste/cycle storage and soft/hard landscaping.	Under construction
17 Bellefields Road, SW9 9UH	18/04311/FUL	Redevelopment of the site, involving the demolition of the existing building and erection of a five storey building plus basement to provide a flexible use (Class A3 and/or A4) at part basement and part ground floors and office floorspace (Class B1) at part basement, part ground and first to fourth floor levels, together with the provision of cycle store and the installation of a green roof and plant on roof.	Under construction

Site Address	Planning Ref	Description of development	Current status of scheme
44 Clapham Common Southside, SW4 9BU	17/00605/FUL	Demolition of the existing buildings and the re-development of the site incorporating the erection of six buildings comprised of basement and lower ground floor levels, ranging from four to 10 storeys above ground, landscaped gardens, public square (587sqm), car parking and associated works; for a mixed use scheme comprised of a waste transfer facility (1,164 sqm GIA) at basement level, B1 office accommodation (3,696sqm GIA) and A3 café (117sqm GIA); and the provision of up to 297 residential units.	Under construction
Clapham Park Estate (Metropolitan Housing Association)	17/03733/FUL	Full phased planning permission for the residential-led, mixed use regeneration of approximately 33 hectares of land comprising the demolition of buildings (864 residential units and 614 sq.m (GIA) of non-residential floorspace) and the construction of new buildings comprising 2,532 new residential units (Class C3); 2,537 sq.m (GIA) of non-residential floorspace providing retail floorspace (Class A1/A2/A3/A4), community facilities (Class D1/D2) including a new community resource centre, and office floorspace (Class B1); specified accesses and highway improvements (including new accesses on to the local road network and new estate roads), demolition of existing and provision of new bus driver facility; car and cycle parking; the provision of areas of public open space, play facilities, hard and soft landscaping and public realm works; and an energy centre and district heating.	Under construction