

Matter 3 – Housing

3.1 Strategic housing provision:

- (i) *Does the Plan address the Government's prioritisation of the delivery of new homes, as expressed in paragraph 59 of the Framework, or is the Plan cautious in its housing delivery?*

Paragraph 59 of the Framework requires Local Plans to support the Government's objective of significantly boosting the supply of homes by ensuring a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The NPPF does not specifically require local planning authorities to prioritise the delivery of new homes. Instead it requires the inclusion of strategic policies to address each authority's priorities for the development and use of land in its area (paragraphs 17, 21 and 23).

One of these strategic priorities in Lambeth is of course the delivery of new homes, which must be balanced against other strategic priorities such as new offices, land for industry and logistics, and social and green infrastructure.

Lambeth's Plan is very clear in Section 3 about the strategic importance of housing growth. In Section 4, Policy H1 and its supporting text directly address the need to maximise housing growth in the borough, to optimise the potential for housing delivery on all suitable and available sites, to optimise levels of residential density using a design-led approach, and thereby to meet and exceed the London Plan housing target for the borough. It also refers to the forthcoming Site Allocations DPD as one mechanism by which this will be achieved, alongside supporting well-designed new homes on small sites, supporting self-build and custom-build housing and encouraging development on windfall sites.

As demonstrated in Topic Paper 10a Housing Provision Statement ([TP10a](#)), which includes an updated housing trajectory and extensive evidence on the supply of small sites in the borough, Lambeth can meet and exceed its London Plan housing target over five and ten years, including the buffer required by national policy. This can be achieved whilst also planning for economic growth and to maintain sufficient industrial floor-space capacity (because of Lambeth's Central Services Area location and in order to address the London Plan waste apportionment) as required by the London Plan; whilst meeting infrastructure requirements; and whilst protecting existing open space. Housing growth can therefore be maximised in Lambeth without jeopardising other strategic priority land uses of equal importance to achieving sustainable development in the borough.

- (iii) *Does the Plan provide a sufficient number and range of housing sites that are suitable for residential and mixed-use development and intensification?*

This Plan does not seek to allocate all potential development sites in the borough. It does carry forward thirteen site allocations from the Lambeth Local Plan 2015 and makes clear that further allocations will come forward in the

forthcoming Site Allocations Development Plan Document (SADPD) (see paragraphs 1.6 and 5.6, and policy H1(iv) for example). The SADPD will also provide an opportunity to update and review the existing site allocation policies.

In addition to site allocations, there is a list of the large sites (0.25ha or above) expected to deliver housing over the initial ten years of the plan period in the housing trajectory to be included in Annex 13 of the plan (as updated in Topic Paper 10a ([TP10a](#))). Further information about large sites with potential for housing delivery in years 11-15 is included in Topic Paper 10a. A number of the identified large sites will be included in the SADPD or are/will be included on the Council's brownfield land register. A small number of these will be sites already identified in this Plan as having potential for industrial intensification and co-location with residential development (see the Changes to the Policies Map document [PD02](#), p23).

With regards to small sites (<0.25ha), these are listed at length in the appendices to Topic Paper 10a and a number of these are already listed on the brownfield land register, with more to be added when that is next updated in December 2020. Given the number of small sites in the borough, it is not realistic to allocate all of these in a development plan document. Many have and will come forward through application of borough-wide policies and design guidance.

Paragraph 23 of the NPPF requires allocation of sufficient sites to deliver strategic priorities "except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies". This is the approach being taken in Lambeth: use of a range of mechanisms alongside site allocations to demonstrate and drive the required level of housing delivery.

Paragraph 68(c) of the Framework makes clear that local planning authorities should promote windfall sites through their policies, which Lambeth does in policy H1 of its Plan. Paragraph 70 adds that, where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends. The evidence for this part of Lambeth's housing supply is discussed in the answer to (iv) below.

NPPF paragraph 68(a) also requires local planning authorities to promote the development of a good mix of sites by identifying, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless it can be shown that there are strong reasons why this cannot be achieved. In the case of Lambeth, approximately 55% of its housing capacity is on sites smaller than 1ha (and 30% on sites smaller than 0.25ha).

(iv) Topic Paper 10 (Housing Provision Statement) sets out the principal components of the Plan's housing provision for the first ten years of the plan period; these are summarised in Appendix 6, and there is detailed supporting evidence. In particular, are: (a) the detailed

housing tables within the Topic Paper justified and realistic? (b) the small site figure of 400 dwellings per annum (dpa) realistic and based on robust evidence? (c) the trajectory for non-self-contained accommodation robust? And (d) any other factors that need to be taken into account in determining whether the principal components of Lambeth's housing trajectory stack up? Overall, is the target of 1,335 dpa to be implemented over the plan period realistic?

The Council has produced an updated version of Topic Paper 10, labelled Topic Paper 10a and dated October 2020 ([TP10a](#)). This has been updated for the following reasons:

- To respond to queries about the August 2020 version of Topic Paper 10 set out in the Inspector's letter [INS02](#) dated 18 August 2020, particularly in paragraphs 5.2.2, 5.2.3, 5.2.4, 5.3.1 and 5.4.1.
- To correct some errors identified in the previous version of the Topic Paper.
- To include the most up-to-date position (to end September 2020), including the latest information about anticipated completion dates.

The overall position is similar to that demonstrated in the original version of Topic Paper 10, with a slight increase in housing supply over both five and ten years and some slight adjustments to the distribution of the housing trajectory to take account of updated information. There is also additional information about small sites delivery, both historic and projected, which – in the view of the Council – further supports its contention that 400 dpa is a realistic small sites assumption based on robust data. The trajectory for non-self-contained accommodation has also been updated and is robust in the view of the Council. This is all explained more fully in Topic Paper 10a ([TP10a](#)), with section 4 specifically focussing on small sites and section 5 on non-self-contained accommodation.

The Council therefore considers that the target of 1,335 dpa over the first ten years of the plan period is realistic and deliverable.

- (v) *In terms of housing provision and site allocations, what is the relationship between this Plan and the Site Allocations Plan which the Council intends to prepare in the near future?*

Please see the answer to (iii) above. As already stated, the SADPD is just one of the mechanisms available to the Council to maximise housing delivery in the borough and ensure the London Plan housing target is met and exceeded.

The forthcoming SADPD will therefore supplement the policies in this Plan to achieve delivery of its strategic priorities. It will take a design-led capacity-assessed approach to allocations, with testing of key assumptions such as development viability, to provide greater certainty on the quantum and tenure of housing to be delivered - alongside any other land uses required. It will not include an allocation for every potential development site in the borough as resources will be focussed on those sites where, for reasons of complexity, a

design-led capacity assessment will add most value to help bring forward optimum capacity. For other sites, this outcome can usually be achieved through the application of borough-wide development plan policies. To be effective, it is necessary to achieve the right balance between the number of allocations included and preparation of the DPD in a timely manner to help drive delivery.

3.2 Delivering affordable housing (AH)

(i) Is policy H2 (delivering affordable housing) justified and effective?

In the view of the Council, policy H2 is justified and effective. This is demonstrated through the response to the more detailed questions below.

The Council has proposed potential changes to the wording of paragraphs 5.20 to 5.28 of the Plan to address comments from the Mayor and ensure full conformity following changes to the London Plan. These proposed changes have been agreed in the statement of common ground with the Mayor ([SCG01](#)). They are listed in the schedule of potential changes ([SD17a](#)) as PC015, PC016, PC017 and PC018.

(ii) The policy links into policy H5 of the London Plan, which indicates specific percentages of AH for different types of sites. Policy H2 (a) (iv), however, seeks financial contributions towards AH on sites providing fewer than 10 units (gross), subject to viability testing. The London Plan policies H4 and H5 refer to AH on major sites, and paragraph 63 of the Framework likewise limits AH provision to major sites. Lambeth clearly has a significant AH need, but is it sufficiently greater than the Greater London average to justify such a departure from the London Plan and national policy?

The Secretary of State's direction to the Mayor asks in DR3 for paragraphs 4.2.12 and 4.2.13 of the Intend to Publish London Plan to be deleted in their entirety on the basis that the approach is inconsistent with the Written Ministerial Statement made by Minister of State for Housing and Planning Brandon Lewis on 28 November 2014, which sets out that affordable housing and tariff contributions should not be sought on developments of 10 units or less.

The direction does not seek the deletion of footnote 50 of the Intend to Publish London Plan, which still states in relation to policy H4's reference to affordable housing in major developments that boroughs may also require affordable housing contributions from minor housing development in accordance with policy H2 on small sites.

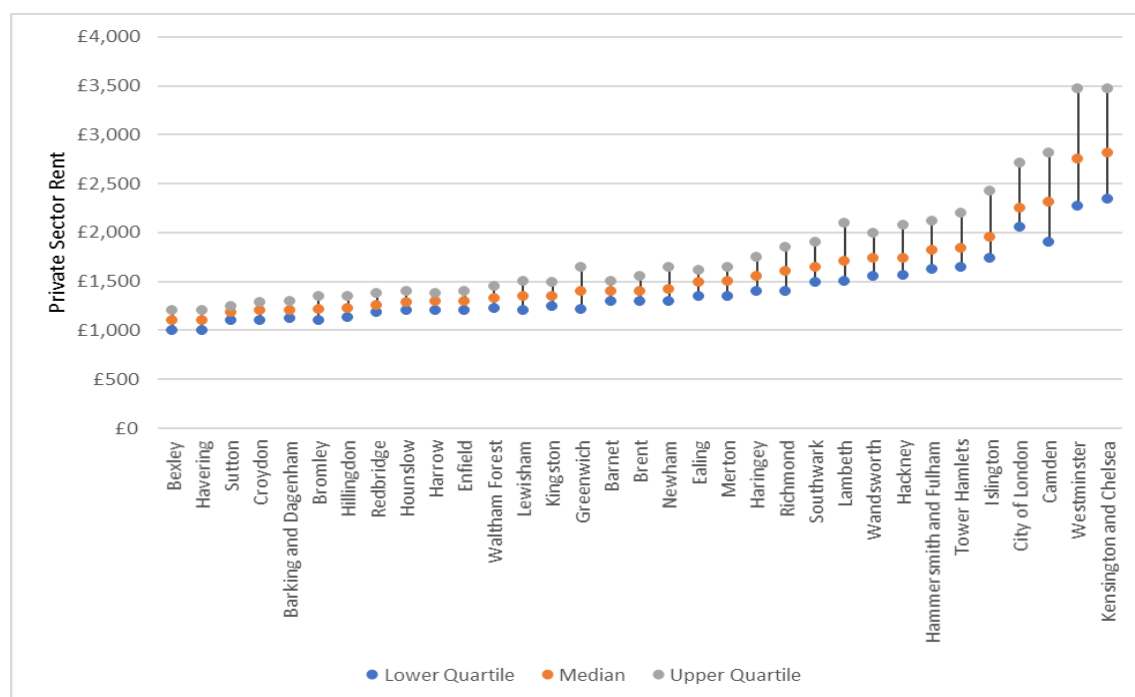
The approach in Lambeth's policy H2(a)(iv) does not set a tariff for affordable housing contributions on sites with fewer than ten units. It is clear that viability will be tested on a case by case basis, based on the methodology in Annex 10 of the Plan. As set out in Topic Paper 1 ([TP01](#)), this approach has been successfully applied in many cases since the publication of the NPPF July 2018 (subsequently updated February 2019) and upheld through the 17 appeal

decisions listed in appendix 1 of the Topic Paper, where inspectors have concluded that national planning policy and guidance was outweighed by the Local Plan policy due to evidence of considerable local need for affordable housing and the contribution minor sites make to meeting this need. The evidence on both counts is also included in Topic Paper 1 ([TP01](#)). See also the analysis of affordable housing need in Lambeth on pages 14-16 of [LBL01](#) and in paragraphs 4.23 to 4.32 of Topic Paper 9 ([TP09](#)).

Lambeth's affordable housing need relative to the Greater London average can be assessed in a number of ways. The first of these is the ratio of house prices to earnings. This information is provided for all boroughs in the GLA's Housing in London 2019 report ([SD24](#)). Table 3 on page 15 of the report shows Lambeth's price to earnings ratio as 14.5, compared to the London-wide figure of 12.3. Lambeth's ratio is also worse than those in similar inner south London boroughs such as Southwark (13.9), Lewisham (13.9) and Greenwich (12.9).

The second measure of relative affordability is through comparison of monthly market rents for a two-bedroom home. The graph on page 83 of Housing in London 2019 ([SD24](#)) shows Lambeth ranking as 10th least affordable of all London boroughs, worse than all other inner south London boroughs apart from Wandsworth. The data source for this graph is the Valuation Office Agency private rental market statistics, published by MHCLG April 2018 to March 2019. The Council has analysed the same data source for the period April 2019 to March 2020 and produced a comparable graph, below.

Lower quartile, median and upper quartile monthly market rents for a two-bedroom home by London borough, 2020



Source: VOA private rental market statistics April 2019 to March 2020

This shows that Lambeth remains in tenth place, so the relative affordability has not improved. However, the range between the lower and upper quartile figures

has increased from the previous year (the length of the line between the upper and lower data points has grown). This is an indication that rents in the borough are getting more expensive, as expensive boroughs tend to have a wider distribution of rents (see fourth bullet point on Housing in London 2019 page 83).

In addition to Lambeth's position relative to the rest of London, housing affordability in London as a whole is of course significantly worse than in the rest of the country and the rest of the south east, as demonstrated by the graphs on pages 68, 69 and 82 of Housing in London 2019. Thus Lambeth's position relative to the rest of England is extremely disadvantaged with regard to housing affordability.

Taken together, the evidence on the level of affordable housing need in Lambeth; Lambeth's position on housing affordability relative to London, the wider south east and England; and the contribution to housing supply from minor sites in Lambeth all provide a strong justification for Lambeth's policy H2(iv) seeking affordable housing contributions from minor sites. The policy approach is reasonable and proportionate because it is based on a case by case assessment of viability: the level of contribution will vary by site circumstances and in some cases no contribution at all will be made because it has been demonstrated to be unviable.

(iii) Are the proposed AH tenure percentages justified for Lambeth?

The rationale and justification for the proposed tenure percentages in H2 (v) is set out in the response to the question about the tenure percentage for affordable housing on pages 14-16 of [LBL01](#). This tenure split has been tested for viability in the Council's Local Plan and CIL Viability Review December 2019 ([EB97](#) table 4.8.1, table 6.10.2).

The justification for the restriction on use of shared ownership where open market sales values exceed £600,000 is set out in section 7 of GLA Housing Research Note 5 – Intermediate housing: the evidence base ([EB101](#)). In these instances, London Living Rent is a more affordable intermediate tenure product (hence the reference in paragraph 5.30 of the Plan). The other way to achieve the Mayor's objective of genuine affordability for intermediate housing in higher value parts of the borough is to cap the household income threshold for eligibility for shared ownership units. This is an alternative approach the Council is willing to follow.

(iv) Parts (c) and (d) from the earlier version of policy H2 have been deleted, which has been interpreted by some parties that there is no longer a requirement for the Council to take into account the circumstances of individual sites, including viability, nor for a financial appraisal to be provided where lower levels of AH are proposed. In the light of these considerations, is the amended policy H2 justified and in accordance with national policy?

Please see the response to the related question on pages 17-18 of [LBL01](#), provided in response to [INS01](#). As this response shows, the wording of policy H2 of the Plan has been revised to align with the Mayor's Fast Track approach

and allow the policy to be implemented alongside London Plan policy H5. London Plan policy H5 has been found to be reasonable and justified, and therefore sound, as set out in the London Plan examination report ([SD03c](#) paragraphs 198-201).

The Council's previous response on pages 17-18 of [LBL01](#) also shows this approach is consistent and in accordance with national policy and guidance, in particular having regard to NPPF paragraphs 34 and 57 and the sections of planning practice guidance that elaborate on them. The principle of the Fast Track approach is as envisaged by the first sentence of NPPF paragraph 57: "Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable." However, the fall-back position of a Viability Tested route allows for case-specific viability testing where circumstances require it – usually where the requirements of the Fast Track route have not been satisfied or where the applicant has demonstrated particular circumstances that justify the need for a viability assessment at the application stage. Given Lambeth Plan's direct application of the London Plan policy H5 threshold approach, the potential for individual site circumstances, including viability, to be taken into account at application stage through the Viability Tested route is fully allowed for. Indeed, this possibility is clearly referred to in supporting paragraph 5.34 of the Plan (under policy H2).

The Plan's application of the London Plan threshold approach has been fully assessed for viability in the LB Lambeth Local Plan and CIL Viability Review, BNP Paribas December 2019 ([EB97](#)). See [LBL01](#) page 13 for a list of the specific references in that report that relate to testing of the affordable housing threshold approach.

In conclusion the amended policy H2 in the Plan is justified and in accordance with national policy.

3.3 Five-year housing land supply: *With reference to paragraph 73 of the Framework, does the Plan provide for at least a five-year supply of housing? Has sufficient allowance been made for non-completions for the Plan to be effective in its housing delivery over five years?*

Yes, the Plan provides for at least a five year supply of housing as set out in section 6 of Topic Paper 10a Housing Provision Statement ([TP10a](#)).

The five year supply includes the required 10 per cent buffer, moved forward from later in the plan period (as stated in NPPF paragraph 73). Planning practice guidance paragraph: 010 Reference ID: 68-010-20190722 adds that the 10 per cent buffer is to account for potential fluctuations in the market over the year and to ensure the five year supply is sufficiently flexible and robust.

Other than this buffer, there is no additional requirement in national policy or guidance to include an allowance for non-completions. Arguably the buffer fulfils that role, because non-completions would be a symptom of market fluctuations. That said, in Lambeth's housing trajectory (in [TP10a](#)) there is 'headroom' of 181

dpa above the five year supply plus 10 per cent buffer (or 851 without the buffer). This therefore provides a further allowance for non-completions to further ensure the Plan is effective in its delivery over five years.

3.4 Housing standards: *Is policy H5, which addresses housing standards, justified and in line with national policy?*

The inclusion of standards in planning policy makes the Council's expectations in this regard clear to both applicants and the public. NPPF allows for local design standards (para 110(d) and 130).

Part (a)(i) of Policy H5 requires new dwellings to provide dual-aspect accommodation, unless exceptional circumstances are demonstrated. This requirement is already adopted policy and remains justified for the following reasons:

- All of Lambeth is characterised historically by dual aspect residential dwellings. It is part of Lambeth's local distinctiveness (see [EB74](#)) and an important contributor to quality of life and visual amenity generally. Where examples of single aspect residential developments exist in Lambeth the residential amenity they provide is of poorer quality than dual aspect units. Single aspect units do not perform as well as dual aspect units – they are more difficult to ventilate naturally, more likely to overheat, more likely to have worse daylight, more likely not to dissipate pollution (see evidence on air quality in Lambeth in [EB54](#)), less likely to offer access to the quiet side of the building, there is less flexibility of rooms, and they are more difficult to provide with private amenity space.
- The Mayor's policy and guidance covers the whole of Greater London. The Mayor of London acknowledges the merits of dual aspect dwellings over single aspect ones (see London Plan Policy D6C and paragraphs 3.6.4 and 3.6.5). Lambeth is the fifth most densely populated local authority in England (see [EB02](#) page 11) and is largely urban/city centre in character. This means issues such as noise, air quality, heat, amenity are more amplified/problematic than in more suburban parts of the city.
- Lambeth's key growth areas of Waterloo, Vauxhall and Brixton are identified as delivering the majority of new residential development. These are already particularly busy city centre / town centre locations where the issues of environmental quality are particularly pertinent. Both Brixton and Vauxhall have regularly high levels of air pollution from vehicles (see [EB54](#)) and Brixton has high levels of socio-economic deprivation ([EB02](#) page 37-38). Waterloo, Vauxhall and Brixton all have major railway lines running through them on viaducts. Waterloo is the busiest mainline station in London. Brixton and Vauxhall both have large night time economies with late night bars and clubs. Single aspect dwellings perform least well in challenging, densely packed urban environments. Noise places great stress on the wellbeing of all, especially the vulnerable.

- Lambeth is a very diverse borough ethnically, culturally, socially and economically and this diversity is constantly evolving. The population is expected to grow by just over 1% for the next five years ([PD03](#), page xi). Parts of Lambeth are deprived and around one third of working age population is defined as being in poverty ([EB02](#) page 34). Public health in Lambeth is significantly behind the England average on a significant number of indicators ([EB02](#) page 42). Key local priorities for health include mental health and wellbeing (See [EB01](#), 'People have support to live as well and independently as they can').
- The London Heat Island Effect described in the London Plan affects the whole of Lambeth to a high degree, and particularly those parts in the Central Activities Zone (see London Plan paragraph 2.4.18) - affecting night time temperatures in particular. Climate change is also making heat-waves more common generally (see Topic Paper 7 ([TP07](#)) and Lambeth Annual Public Health Report 2020 about the impacts of climate change on health ([EB103](#))). Heat places great stress on the wellbeing of all, especially the vulnerable. Single aspect flats do not stand up well in terms of natural ventilation. Reliance on air conditioning, mechanical ventilation and electric fans place an extra cost on householders and on the environment, by increasing rather than reducing carbon dioxide emissions.

In conclusion, given the specific environmental, demographic, health and well-being issues facing Lambeth it is essential that the highest standards possible are applied to new residential development. The acknowledged inadequacies of single aspect flats affect the wellbeing of occupants and remove their sense of control over their personal environment.

Parts (a)(ii) and (iii) of policy H5 cross-refer to London Plan standards.

Parts (b) (i)-(iii) set out Lambeth-specific standards for outdoor amenity space, reflecting local circumstances. Much of the evidence about health and well-being supporting the requirement for dual aspect units also justifies Lambeth's requirements for external amenity space in new residential units ([TP07](#), [EB02](#), [EB03](#) and [EB103](#)). In addition, Lambeth has an existing deficit of open space (see [EB65](#), [EB66](#), [EB67](#), [EB68a](#) and [b](#)), with a rising population placing additional pressure on existing spaces. Being one of the most densely populated areas in the country ([EB02](#) page 11) there are limited opportunities for creating major new areas of open space in the borough. It is therefore essential that opportunities to provide amenity space in new residential developments are maximised. Access to outside space is essential for health and wellbeing, particularly among households on lower incomes (see [EB03](#) page 14 and [EB103](#)); and this has become increasingly important since the onset of the Covid-19 pandemic, acknowledged in a recent appeal decision in South London (APP/P5870/W/20/324905 - 2-4 Copse Hill and 52-54 Brighton Road, Sutton).

The amenity space standards set out in Policy H5 have been applied in Lambeth since July 2008. These established standards have been shown to be deliverable and have achieved good results without compromising housing delivery (see [SD10](#): Annual Position Statement: Housing Supply & delivery 2019 and pages

46-47 of Topic Paper 2 ([TP02](#))). The policy in the revised Plan has been amended from the adopted position to make clear that the communal space requirement for flatted schemes will only apply with 10 or more units. Flexibility is also provided within paragraph 5.50.

Part (b)(iii) of policy H5 sets out standards for amenity space for non-self-contained accommodation. An increasing number of applications for purpose built student accommodation and large-scale purpose-built shared living are coming forward, and it is necessary to ensure that the quality of accommodation provided supports the physical and mental well-being of occupants, for all the reasons set out above. As above, access to open space has been shown to be increasingly important during the Covid-19 pandemic.

Part (c) reflects good practice to ensure high quality communal amenity space and builds upon guidance in the London Plan Housing SPG 2016 ([SD28](#) standard 4).

Part (d) cross-refers to London Plan standards and guidance. The ‘tenure-blind’ requirement is important for reasons of social equity.

3.5 Residential conversions: *Is policy H6 justified, or will it, as some parties argue, increase stress in the area and encourage illegal conversions?*

The justification for the changes to policy H6 on residential conversions is set out in section 5 (page 17 onwards) of Topic Paper 2 Review of policy on small housing sites ([TP02](#)). The importance of this approach is also addressed in the small sites section of Topic Paper 10a Housing Provision Statement ([TP10a](#)).

In the view of the Council, the revised approach achieves an appropriate balance between increasing the number of number of homes delivered on small sites (as required by the London Plan and national planning policy), preserving a stock of family sized houses, and mitigating pressures arising as a result of conversion.

Whilst it is acknowledged that residential conversions have potential in some cases to cause negative impacts, policy H6 includes measures to manage and mitigate these pressures including in relation to refuse and cycle storage and parking. In combination with the policies on housing standards (H5), amenity (Q2) and extensions (Q11), provision is made for adequate amenity space for each dwelling, with protection of amenity by managing the relationship with neighbouring properties. H6 (b)(ii) seeks access to a garden for family-sized dwellings resulting from conversions in order to improve health and well-being and reduce pressure on public open spaces.

Rather than increasing illegal conversions, the revisions to Policy H6 will result in an increase in the number of dwellings that have the potential to be lawfully converted. The reduction in the threshold for conversion from 150sqm to 130sqm in particular will increase the range of dwellings with the scope to be converted. [TP02](#) Table 13 demonstrates that homes in Lambeth in this size

range are typically 4 bedrooms or more. Illegal conversions brought to the attention of the Council will be the subject of enforcement action.

3.6 Student housing: *Is policy H7 justified? What is the evidence to state that two student housing units within 500m of each other has an unacceptable impact on residential amenity?*

The justification for policy H7 is set out in section 2 of Topic Paper 9 ([TP09](#)).

Policy H7 and its supporting text do not state that two student housing units within 500m of each other will have an unacceptable impact on residential amenity. However, paragraph 5.126 in the supporting text to policy H13 on large-scale purpose-built shared living (LSPBSL) does state that generally there should be no more than two such uses, including purpose-built student accommodation (PBSA) within any given 500m radius. The Council has given further consideration to this point and proposes to delete the last part of the last sentence of paragraph 5.126: "~~... and there should be no more than two such uses within any given 500m radius.~~"

3.7 Older people's housing:

(i) Does policy H8, which addresses housing to meet specific community needs, make adequate provision for the supply of housing for older people?

Yes, for the reasons set out on pages 18-20 of [LBL01](#).

It should be noted that the need identified in the London Plan is for sheltered housing and extra care housing, rather than additional residential care homes, given the existing supply of that type of accommodation in both London and Lambeth. See paragraphs 4.13.4 to 4.13.9 in the London Plan, and supporting evidence in 'Older Persons Housing Benchmarks: assessing future potential demand for older persons housing, care homes and dementia housing in London, Three Dragons Nov 2017' ([EB111](#)); and the Lambeth SHMA 2017 ([EB09](#) pp 69-73).

Please also see the Care Home Commission Report and associated evidence from the Care Quality Commission, prepared by Liz Clegg, Associate Director Integrated Commissioning, London Borough of Lambeth & NHS South East London CCG – Lambeth Team ([EB112a](#), [EB112b](#) and [EB112c](#)). This demonstrates that Lambeth has more than adequate nursing and residential home provision to meet the needs of its population.

Coin Street Community Builders (CSCB, [R037](#)) have indicated they intend to submit evidence to the examination that they consider demonstrates need for additional care home provision in the borough. This report was commissioned by CSCB and prepared by Philip Mickelborough of Kingsbury Hill Fox Limited. It is understood that the primary purpose of the CSCB evidence is to justify the proposed development of one of that organisation's sites (at Gabriel's Wharf,

part of Site Allocation 9) as a residential care home. The Council has made clear throughout the preparation of the Local Plan review (including in discussions with CSCB) that existing site allocations will be reviewed through the forthcoming Site Allocations DPD (SADPD). In the view of the Council, any consideration of this evidence during the examination of the revised Local Plan should be in the context of policy on older people's housing at a borough-wide level and not in relation to site-specific proposals (which can take place through the examination of the SADPD).

With that in mind, the Council - with the support of Lambeth Integrated Commissioners – has considered the CSCB-commissioned report and wishes to raise the following points:

- The report focusses heavily on the number of older people living in a number of wards in and around Coin Street and an assessment of the number of care homes in the vicinity as the main supporting evidence for their proposal for a nursing home on the Coin St site. It must be noted that the report only makes reference to one ward in Lambeth (Bishops) with the majority of the data relating to two wards in neighbouring Southwark and The City of London and two wards in Westminster. Lambeth already has a substantial number of older people placed by other boroughs in existing care homes and therefore would not support the building of another home (see [EB112a](#), [EB112b](#) and [EB112c](#)).
- The report primarily provides a number of graphs and tables setting out the demographic changes and equates this to number of nursing home beds required i.e. the Age Standardised Demand (ASD). There is reference to other factors having an impact on this, including use of extra-care, availability of domiciliary care, mobility of the population and catchment area, however how these factors have been applied locally has not been demonstrated. The Council would therefore have expected reference to the local care market as well as reference to the strategic priorities for older people's care in all of the four boroughs; however this is not made clear in the report, which just appears to translate the need for more beds based on more older people in that area albeit only in one Lambeth ward.
- Later in the report there is reference to what is already available in the various boroughs. Page 23 includes mention of an extra-care scheme on Albert Embankment and, while this not named, it is assumed to be Bankhouse which comprises 48 affordable rented units and 34 shared ownership units. Southwark Council are also developing their own care home strategy with a commitment to build two new nursing home in the borough including Burgess Park in nearby Camberwell. This will have a direct impact on the market in Southwark by increasing capacity, as well as the knock-on effect of releasing additional capacity in Lambeth where Southwark place a considerable amount of people.

(ii) Should it be more aligned with policy H13 of the London Plan?

In the Council's view, policy H8 is aligned with policy H13 of the London Plan, for the reasons set out on pages 18-20 of [LBL01](#). The Mayor raised no concerns about the general conformity of this policy in his opinion dated 13 March 2020 ([R054](#)).

(iii) Does the Plan show sufficient awareness of the need to meet the housing needs of this relatively fast-growing section of the Borough's population?

The Council would be happy to include additional supporting text making reference to the assessment of housing need for older people within the Lambeth SHMA 2017 ([EB09](#)), the types of accommodation needed in the borough and the importance of meeting this need.

3.8 Gypsy and traveller accommodation: *Is the provision for three pitches for gypsies and travellers over the plan period, as set out in policy 10, justified and in line with national policy?*

The justification for the pitch provision in policy H10 and an assessment of the approach against national Planning Policy for Traveller Sites (PPTS 2015) are set out in the evidence base document 'Assessment of Gypsy and Traveller accommodation need in Lambeth – bringing together the evidence October 2017' ([EB11](#)). This document draws together the additional detailed evidence provided in the London Borough of Lambeth Gypsy and Traveller and Travelling Show-people Accommodation Assessment 2014 ([EB12](#)), the 2016 update of that document ([EB13](#)) and the Lambeth Gypsy and Traveller Land Supply Assessment Study ([EB14](#), [EB14a](#) and [EB14b](#)).

3.9 Estate regeneration:

(i) Should the wholesale demolition of estates only take place after a favourable ballot of all estate residents, and if so, why?

Since 18 July 2018, the Mayor has required any landlord seeking GLA funding for estate regeneration project which involve the demolition of social homes to show that residents have supported their proposals through a ballot. The requirement applies to projects that involve the demolition of any social homes and the construction of 150 or more homes (of any tenure). Further information is provided in the Mayor's [Resident ballot funding condition: summary](#).

The Mayor's London Plan states in policy H8C that boroughs, housing associations and their partners should "balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding". Paragraph 4.8.4 of the London Plan adds that "All proposals for [estate regeneration] schemes should take account of the requirements of the Mayor's Good Practice Guide to Estate Regeneration (2018)

and the requirement for a ballot of residents when accessing Mayoral funding for schemes that involve demolition.”

This guidance is clear and will apply to all relevant estate regeneration schemes in Lambeth, because the Mayor’s London Plan is part of the development plan for Lambeth. Lambeth’s Plan is clear in paragraph 5.100 that London Plan policy H8 will apply to estate regeneration schemes in the borough. It is not necessary to repeat this guidance in the Lambeth Local Plan. In any event, the requirement for a positive ballot will be applied through the Mayor’s funding mechanisms rather than through the planning decision-making process, so is not strictly a matter of planning policy.

(ii) Is the 50% AH requirement in policy H11 too onerous and counterproductive?

The Council has considered the representations received on Policy H11 and has proposed a number of clarifications to the wording of the policy and supporting text. These are included in the schedule of potential changes ([SD17a](#)) as PC019, PC020, PS021 and PC022.

The 50 per cent affordable housing requirement is not onerous because it will be assessed on the basis of the overall proportion of affordable housing that will result in the final estate regeneration scheme, once all phases have been completed, rather than on each individual phase. This can in some cases include blocks that are being refurbished as part of the regeneration scheme (see supporting paragraph. This gives considerable flexibility to applicants. The requirement also includes, rather than being additional to, the requirement to replace on an equivalent basis any social rented floor-space that is lost.

The overall assessment is made on the basis of habitable rooms and section (c) of the policy provides flexibility around the tenure split within the 50 per cent affordable housing to be provided (subject to the re-provision of existing social rented floor-space). There is additional flexibility in section (d) around dwelling size mix. Thus there is scope for estate regeneration schemes to take a place-specific approach to the type and size of affordable housing provision, having regard to the particular needs of existing and prospective tenants and the principles of mixed and balanced communities. Policy H11 therefore take precedence over policies H2 and H4 for estate regeneration schemes. This provides considerable further flexibility to applicants.

As required by the London Plan, all estate regeneration schemes must be viability tested to ensure maximum transparency around the delivery of additional affordable housing. The Lambeth Plan makes clear in paragraph 5.102 that development viability will be considered in the round for each estate regeneration proposal rather than for each individual phase, because the financial model for the proposal will be based on a whole-estate approach that includes cross-subsidy between different elements of the housing that is to be re-provided plus provision of other benefits. This approach helps ensure the policy approach is not onerous or counter-productive.

This approach was recently applied successfully in assessing the full planning application (17/03733/FUL granted December 2019) for the revised Clapham Park Estate master-plan covering 33ha of land and comprising the demolition of 864 existing residential units and provision of 2,532 new units. Affordable housing was assessed across the whole estate, which inevitably requires a phased build-out. The whole-estate approach resulted in provision of 53% affordable housing in total across the development. The net increase in affordable housing units was 529 (32% of the total net additional units in the scheme).

3.10 Build to rent: *Is policy H12 too onerous in relation to London Plan policy H11?*

No, policy H12 is not too onerous in relation to London Plan policy H11. The detailed rationale and justification for the approach is set out in section 4 of Topic Paper 9 ([TP09](#)). This includes an explanation of the relationship between the London Plan policy and the Local Plan policy. The topic paper also explains how the Lambeth policy approach is proportionate, reasonable and flexible to allow for site-specific circumstances where the requirements in part (a) of the policy cannot be achieved. An alternative approach is allowed for in part (b) of the policy, and the provisions applying in those cases are also explained and justified in the topic paper.

3.11 Large-scale purpose-built shared living:

(i) Is the requirement in policy H13 for the provision of 15 sqm of functional living space separate from the communal living facilities, justified?

The justification for this requirement is set out in section 3 of Topic Paper 9 ([TP09](#)) – see pages 20-21.

(ii) Is the provision of rent caps justified and in line with national policy?

The justification for the rent cap is set out in section 3 of Topic Paper 9 ([TP09](#)) – see paragraphs 3.14 to 3.20 on pages 21-22.

This approach is consistent with national policy. Paragraph 59 of the NPPF requires that the needs of groups with specific housing requirements are addressed. Paragraph 61 adds that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including people who rent their homes.

The Lambeth SHMA 2017 ([EB09](#)) assesses the needs of those in the Private Rented Sector. Private Rented Homes make up a significant proportion (33%) of homes in Lambeth (Table 3, page 22). Average rents in Lambeth are 56% of average incomes, demonstrating that the Private Rented Sector is unaffordable for a significant proportion of the resident population (para 5.6). To address this need for rented housing, it is necessary to increase the supply of private rented

accommodation but also to ensure that new accommodation is accessible to those in the borough who need it, including in relation to price. New LSPBSL in Lambeth will not be able to meet this need if the rents are significantly higher than other private sector rents in the borough. This would simply attract higher income individuals from outside the borough but have no impact on addressing unmet housing need in the borough.

This approach is also consistent with paragraph 8(a) of the NPPF, which defines the social objective of sustainable development, which is to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.

There is nothing in national policy that precludes this approach.

(iii) What is the basis for limiting the applicability of this policy to certain areas?

Please see section 3 of Topic Paper 9 ([TP09](#)), paragraphs 3.9 to 3.11 on pages 19-20.

(iv) Is part B of the policy too limiting and negatively framed, and is the exclusion of public sector land from the provisions of the policy justified?

The justification for the provisions in part (b) of the policy is set out in section 3 of Topic Paper 9 ([TP09](#)), paragraphs 3.21 to 3.23 on pages 22-23. Further clarification is given in supporting paragraphs 5.125 and 5.126 in the Plan. It is proposed to delete the words “or historic” from the fourth bullet point of paragraph 5.125 (as is already proposed for paragraph 6.104 of the Plan, see [SD17a](#) reference PC039). Please see also the response to matter 3.6 above, which proposes an amendment to the last sentence of paragraph 5.126.

Given that part (c) of the policy includes provision for a 50 per cent affordable housing threshold (which would apply to public sector land), it is proposed to delete the part of section (b) that states this type of accommodation will not be permitted on public sector land.

The provisions in part (b) are not limiting as they allow this type of accommodation to come forward on other sites not already allocated for other uses or consented for C3 housing; particularly given the amendments to wording proposed.