

Examination of Draft Revised Lambeth Local Plan 2020-2035

Inspector's Matters Issues and Questions: Statement on behalf of Grainger Plc (R068)

Matter 3 - Housing

3.4 Housing Standards

Is policy H5, which addresses housing standards, justified and in line with national policy?

Grainger Plc has objected to Part (i) of draft Policy H5, which requires new residential development to '*provide dual-aspect accommodation unless exceptional circumstances are demonstrated*'. The Council's justification for this is that such a requirement already exists in the adopted Local Plan. This is true. However, Grainger has had experience of trying to renew housing estates within the Borough against this policy and found it not to be workable. In light of this experience and with the draft policy seeking to go far further than either the London Plan or the Intend to Publish London Plan, it is wholly appropriate to relook at it at this review – that is precisely when policy should be re-examined and not maintained merely because it is in the previous plan.

The only way of providing major housing developments at the density required, with all units being dual aspect, would be by building towers. Whilst residential towers can play a role, they are not always the appropriate form of development in existing urban areas and could conflict with the context and urban grain already evident in an area. What is important is to ensure good quality accommodation, including achieving levels of daylight which complies with the BRE guidance and these matters can be assessed as part of the normal development control process.

The Intend to Publish London Plan continues to take a similar stance to housing standards with Policy D6 Part C still stating that housing development should maximise the provision of dual aspect dwellings, going on to state that single aspect dwelling should only be provided where it is considered a more appropriate design solution in optimising site capacity and where 'it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.' Lambeth's suggested draft wording goes much further and would only allow single aspect dwellings where 'exceptional circumstances are demonstrated'.

Lambeth does not provide any actual justification for going further.

As well as not conforming with the London Plan, the effect of the draft policy would not be consistent with the NPPF, which requires development to be sympathetic to the local character and surrounding built environment (paragraph 127(c)).

In order to achieve compliance with the London Plan and not impose an unjustified additional onerous restriction, draft Policy H5(a)(i) needs to be replaced with the following wording:

"maximise the provision of dual aspect dwellings, with single aspect dwellings only being provided where it would achieve a more appropriate design solution and help optimise site capacity, provided it can be demonstrated those dwellings would have adequate ventilation, daylight, privacy and avoid overheating".