

Monday, 18 May 2020

Planning Policy Team
London Borough of Lambeth
Civic Centre
6 Brixton Hill
London
SW2 1EG

Dear Sir / Madam

Re: Written Representations on Draft Lambeth Local Plan

We write further to our written representations submitted on 13 March 2020 in respect of the Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020) on behalf of Caddick Developments and with reference to the BizSpace site at 61 Lilford Road, Camberwell, London, SE5 9HR.

As you will be aware, the Secretary of State for Housing, Communities and Local Government issued a letter to the Mayor of London on the same day, 13 March 2020. The letter from the Secretary of State exercises powers under section 337 of the Greater London Authority Act 1999 to direct that the Mayor of London cannot publish the London Plan until they have incorporated the Directions set out in Annex 1. Although the consultation deadline left little time to comment in detail, our written representations summarised the extracts from the Secretary of State's letter which are relevant to the policies contained in the Lambeth Local Plan Proposed Submission Version.

In light of the fact that the GLA have yet to respond to the Secretary of State's letter and Direction, and in the absence of a clear regional policy context on key issues, therefore, we are concerned that your Council still intend to submit the Lambeth Local Plan to the Secretary of State for Examination.

The focus of the Secretary of State's letter was the need to increase the level and rate of housing delivery through the removal of policy constraints on the redevelopment of employment land for mixed or residential use.

In this respect, we have raised in our earlier representations concerns that Lambeth have thus far failed to maximise opportunities for the co-location of residential and employment uses and are proceeding to submission without reflecting on the Secretary of State's intervention or its implications for the Local Plan's policies.

In summary, we believe that the Secretary of State's comments can be positively addressed by exploiting further opportunities to optimise housing delivery and employment opportunities by actively promoting co-location and mixed-use development of suitable existing employment sites. Further, the Plan should promote co-living or shared living opportunities, rather than restricting these to a few areas within the Borough, as they represent a major source of potential housing delivery over the plan period.

Specifically, we would urge the Council to look again at the current wording of **Policy H13** which includes restrictions on the location of shared living accommodation, whilst **Policy ED3** fails to recognise the potential for co-location and intensification of KIBA sites.

Maximising Housing Delivery

The letter from the Secretary of State to the Mayor of London described housing delivery in London as *"deeply disappointing"* and referred to an average of just 37,000 homes a year over the past three years. Further to this, the letter noted that the housing targets in the Intend to Publish version of the London Plan fall well short of the identified need:

"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."

This is clearly relevant to Lambeth, given that the targets are capacity led and reflect the policy assumptions made over the protection of employment land from co-location or mixed-use redevelopment.

We accept that Policy H1 of the Draft Lambeth Local Plan commits the Council *"to maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29"*. However, given that these targets are some 21% short of need across all boroughs, this requires fresh thinking and a more pro-active approach to the identification of suitable housing sites.

Further to this, it is noted that the projected completions set out in Annex 13 of the Draft Lambeth Local Plan include a total of 4,000 homes to be delivered on 'Small Sites' (less than 0.25 ha). The Secretary of State's letter referred to the *"lack of credibility"* the Panel of Inspectors were able to attribute to the small sites policies in the Intend to Publish version of the London Plan. This poses questions over whether the small sites policy will be sufficient to deliver the projected number of homes over the 10-year period of the Plan.

There is significant pressure on London as a whole to increase housing delivery above the figures proposed in the Intend to Publish version of the London Plan, as reflected in the comments made by the Secretary of State in his letter. One key component in achieving a sufficient level of housing delivery is the maximisation of residential density, with the Secretary of State's letter stating as follows:

"It is important that development is brought forward to maximise site capacity, in the spirit of and to compliment the surrounding area, not to its detriment. Sites cannot be looked at in isolation and Londoners need to be given the confidence that high density developments will be directed to the most appropriate sites; maximising density within this framework."

The letter from the Secretary of State is very clear in setting out that leaving thousands of homes a year needed but unplanned for will exacerbate the affordability challenges within and around the capital. It is, therefore, incumbent upon all local planning authorities to seek to maximise housing growth.

It is recognised that pressure for housing and lack of supply is a major problem in London. In this regard, where there is the opportunity to provide additional housing in an acceptable manner, such opportunities should be taken. Policy H1 of the Intend to Publish version of the London Plan states that boroughs should *"optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions"*.

We consider that the Draft Lambeth Local Plan could go much further in its commitment to maximising housing delivery, particularly in terms of the need to actively consider co-location and land use intensification, which is relevant in terms of the Key Industrial and Business Areas (KIBAs).

The current wording of Policy H13 includes restrictions on the location of shared living accommodation, whilst Policy ED3 fails to recognise the potential for co-location and intensification of KIBA sites.

It is our view that Policy H13 should not restrict the location of shared living accommodation to Waterloo and Vauxhall. Such an approach is overly restrictive and fails to recognise that this particular form of accommodation can play an important role in supporting key workers and those employed by local institutions, irrespective of their location. Policy H16 of the Intend to Publish Version of the London Plan supports the development of shared living accommodation and does not include such restrictions on location. We consider that such locational restrictions will prevent the London Borough of Lambeth from maximising housing delivery.

The overall level of housing in London does not meet the identified need and hence every borough is required to do everything it can to maximise housing delivery. This means taking a real and evidential look at every site feasible.

The BizSpace site at 61 Lilford Road is an example of where the Council has failed to do so. This site is capable of providing a net increase in employment space and over 250 units of shared living accommodation, which would add to the flexibility of supply identified under Policy H1 and in the housing trajectory.

Restrictive Industrial Land Policies

The letter from the Secretary of State to the Mayor of London is critical of those policies which restrict development on industrial land, particularly those policies which require "no net loss". The letter stated as follows:

"Planning clearly requires a judgement to be made about how to use land most efficiently, enabling sufficient provision for housing, employment and amenity. The Inspectors considered your industrial land policies to be unrealistic; taking an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand. I am directing you to take a more proportionate stance - removing the 'no net loss' requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply."

Policy ED3 of the Draft Lambeth Local Plan is even more restrictive than the industrial land policies set out in the Intend to Publish version of the London Plan. It unduly restricts co-location of employment and residential uses such as co-living accommodation and prevents development that could enhance the quantity and quality of employment space while contributing to housing supply.

Policy E7 of the Intend to Publish version of the London Plan refers to industrial intensification and co-location. The policy is clear in stating that development plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of Significant Industrial Locations (SIL) could be intensified to provide additional industrial capacity and support the delivery of residential and other uses.

The London Borough of Lambeth's KIBA Review Document states that KIBAs are Lambeth's 'Locally Significant Industrial Sites' (LSIS), as defined in the London Plan. The new London Plan is seeking to facilitate co-location on SILs which are London's most important industrial sites. The Draft Lambeth Local Plan is seeking to impose a level of restriction which exceeds this on sites that are simply identified as locally significant.

The Secretary of State's letter is clear in directing the Mayor of London to remove the "no net loss" requirement on existing industrial land sites.

This discrepancy is illustrated by the case of the Caddick/BizSpace site at 61 Lilford Road. Our client is not only proposing to retain the same level of employment, but to provide a net increase. The existing buildings on the BizSpace site comprise an overall floorspace of 3,002 sqm. Our client has worked with BizSpace to prepare plans for a mixed-use redevelopment of the site to include 3,358 sqm of employment floorspace, including 1,969 sqm of light industrial floorspace and 1,389 sqm of office floorspace. The proposals would provide for an overall increase of 149 sqm light industrial space and 356 sqm in employment floorspace on the site overall. This would provide an intensification of light industrial use in both quantum and, importantly in quality – with all of the space now meeting GLA standards.

As a matter of principle, we would submit that the redevelopment of a site of this nature should be considered acceptable where it retains the same level of employment floorspace, whilst providing a more efficient layout and modern buildings that meet future needs.

The underlying objective should be the intensification of employment generation within the site while allowing the site to contribute also to meeting housing needs.

Summary and Concluding Comments

We would urge the Council to reconsider the stance set within the Draft Lambeth Local Plan to positively respond to the Secretary of State's comments and Direction on the London Plan. It is not advisable in our view to proceed to submission of the Draft Local Plan based on capacity led housing targets that are clearly well below housing need and where there are unjustified restrictions on the opportunities presented for mixed-use development of additional existing employment land and on opportunities for co-living.

We would ask that the Plan should further reassess the opportunities presented by existing brownfield employment land, especially where this can lead to an improvement in employment space and new housing. Specifically, the current wording of Policy H13 includes restrictions on the location of shared living accommodation, whilst Policy ED3 fails to recognise the potential for co-location and intensification of KIBA sites. The site identified by Caddick and BizSpace at Lilford Road is just one example of such an opportunity.

The Secretary of State's letter to the Mayor of London is very clear in setting out the need to maximise housing delivery and to remove restrictions which prevent London from delivering its housing need. This requires a step-change in policy, and we contend that as things stand, the Draft Lambeth Local Plan fails to follow the advice of the Secretary of State.

We remain available to discuss our written representations and would welcome a meeting, or video conference in light of the current restrictions pertaining to Covid-19.

Should you have any queries or require an update on any matters, please do not hesitate to contact us.

Yours faithfully



Steven Fidgett
Director