

## **Matter 5 – Social infrastructure**

### **5.1 Section 7:** *Are policies S1-S3 positively prepared, justified, effective and consistent with national policy?*

Policies S1 to S3 have been prepared on the basis of the assessment of need for social infrastructure set out in the Council's Infrastructure Delivery Plan (IDP) ([EB99](#)), having regard to paragraphs 8(b), 16(c), 20(c), 25, 26, 34 and 92 of the NPPF and policies S1 to S5 in the London Plan.

The IDP has been prepared through proactive engagement with infrastructure providers in the borough and is based on the latest available information at the time of submission (May 2020). The policies are designed to safeguard existing provision whilst being flexible enough to accommodate changing circumstances during the plan period and to allow for appropriate upgrading of facilities, as well as enabling the implementation of the agreed estates strategies of the various service providers.

The policies in section 7 of the Plan are supplemented by policies D3 and D4 relating to infrastructure and planning obligations respectively. Please note the potential changes to Plan wording at policies D3, D4 and paragraph 4.17 proposed in response to the representations from the Department of Education ([R033](#)) and the Healthy Urban Development Unit ([R036](#)), recorded in the Schedule of Potential Changes ([SD17a](#)) as PC011, PC012 and PC013.

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### **5.2 Safeguarding existing infrastructure:** *In relation to policy S1 (safeguarding existing social infrastructure), is the facility for allowing payments in lieu, even in exceptional circumstances, in accordance with national policy?*

Yes. The Council's priority is to address national policy by planning effectively for sufficient infrastructure of the right quality in the right places, as far as this can be achieved through the plan-making and development management process; and to do so in partnership with service and infrastructure providers. There is nothing in national policy or guidance that precludes allowance for payments in lieu of replacement facilities in exceptional circumstances. Payments in lieu of this nature will be secured through planning obligations in accordance with the statutory tests in paragraph 56 of the NPPF.

The facility for allowing payments in lieu is included to enable flexibility, but only where exceptional circumstances are demonstrated in accordance with part (c) of the policy and supporting paragraph 7.11. The onus is placed on the applicant to demonstrate to the Council why replacement provision would not be feasible and/or effective. This provides a transparent basis upon which to assess applications of this nature. It is not a process that will be followed as a matter of course because it is only allowed in exceptional circumstances. The primary objective of the policy is to retain or secure replacement facilities to serve the needs of the area. The facility for payments in lieu has been included to avoid situations where 'tokenistic' replacement facilities are provided on sites to satisfy

policy, but where these do not actually provide useable or effective space to meet needs. Whilst this circumstance is not common, it does arise and is best avoided through the provision in part (c) of the policy.

Please note the statement of common ground agreed with Sport England ([SCG25](#)) and the resulting potential changes to Plan wording recorded in Schedule [SD17a](#) (items PC043, PC044 and PC071).

### **5.3 New or improved social infrastructure:**

*Should libraries be added to the list in policy S2 (new or improved social infrastructure)? If so, presumably this should be reflected in the IDP.*

Paragraph 7.4 makes clear that policy S2 applies to libraries. Libraries are also referred to in paragraph 7.19. Libraries are already covered in the IDP as stated at paragraph 4.2 and on page 15 of that document ([EB99](#)). All existing libraries are protected under policy S1.

*Does policy S2, and the proposals for Site 1 (Land north and south of and including 10 Royal Street, SE1 [Founders Place]) adequately cover the requirements for new and improved health care facilities in the Borough?*

Yes, in combination with the new and improved health care facilities identified in sections 3 and 4 of the IDP and the strategies listed in annex 1 of that document ([EB99](#)). This list of strategies reflects the latest information made available to the Council during its engagement with providers in preparing the IDP. If subsequent strategies are agreed and made public, these will be taken into account (as is made clear in paragraphs 7.10 and 7.13 of the Plan). Site allocation 1 will be updated as necessary in the forthcoming Site Allocations Development Plan Document to take account of the latest proposals for that site.

*Is the proposed restriction on building heights in the southern half of the site (Site 1) appropriate in view of its location within the Conservation Area and proximity of Archbishop's Park?*

The main driver behind this restriction within Site allocation 1 is the desire to avoid an unacceptably dominant effect on the setting of Archbishop's Park and its contribution to the special interest of the Lambeth Palace Conservation Area. However, there is also the potential effect of height here on the setting of the Grade II listed buildings of St Thomas's Hospital when viewed from Lambeth Bridge (LVMF view 19A.1 – see [EB86](#)), which lies to the south-west. These considerations cumulatively suppress building heights along the southern part of the site allocation where it bounds Archbishop's Park.

Tall building Location W8 (see Annex 11 of the Plan) overlaps with part of this site allocation. However, for the reasons outlined above, Location W8 does not extend to cover the land on the south side of Royal Street which abuts Archbishop's Park.

**5.4 Schools:** *Does policy S3 (Schools), and the proposals for Site 4 (New Park Road, SW2) provide an adequate framework to enable the provision of sufficient sites for educational purposes for the Borough, including years 10-15 of the plan period?*

Yes, policy S3 enables delivery of the Council's agreed strategy for provision of additional state-funded school places in the borough, the latest version of which is reflected in the IDP ([EB99](#)), based on a report published in January 2019. The Council typically updates its assessment of school place need every one or two years. This exercise takes account of data on the development pipeline provided by the Council's planning service, and there is close joint working between the two services on this matter. This helps ensure anticipated housing growth and its geographical distribution across the borough are fully factored into the assessment. However, the school place planning process operates on a shorter horizon than the full 15-year local plan period. Given all the different variables at play, it is not possible to plan reliably for school places 10 to 15 years ahead. The Local Plan must be reviewed every five years so this provides an opportunity to look again at land for schools in a shorter time-frame if circumstances change significantly.

The most up-to-date position on school development and expansion (based on the latest school place planning data) is listed on pages 10-11 of the IDP ([EB99](#)). All of these projects have planning consent so no additional site allocations are required.

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