
**Examination of Draft Revised Lambeth Local Plan 2020-2035
Response to Inspector's Matters, Issues and Questions**

Matter 5 – Social infrastructure

1. This written statement is submitted to the Lambeth EIP on behalf of Stanhope PLC in response to Questions and Matters for discussion at the Examination in Public, raised by the Inspector in relation to Matter 5 specially in respect of New or improved social infrastructure set out at paragraph 5.3.

Questions

5.3) In particular, in policy 2, Site 1, Design principles and key development considerations, (iii), is the proposed restriction on building heights in the southern half of the site appropriate in view of its location within the Conservation Area and proximity of Archbishop's Park?

2. The southern half of Site 1 is not included on page 181 of the draft Local Plan where suggested heights and the plan are detailed. This part of the Site is the only part of the Site located within a Conservation Area and is adjacent to Archbishops Park.
3. The draft Site 1 design principles set out on page 182 of the Draft Local Plan state:

"This under-developed site provides opportunities for the expansion of St Thomas' Hospital. The council will support development that:

- (i) replaces the existing housing;*
 - (ii) retains 10 Royal Street and Holy Trinity Urban Centre that are considered to make a positive contribution to the conservation area;*
 - (iii) restricts building heights in the southern part of the site due to its location within the conservation area and proximity to the park;*
 - (iv) has a layout that includes gaps between buildings to allow views through to the conservation area and the registered park and into the site;*
 - (v) fronts onto and creates a clear pattern of streets;*
 - (vi) does not appear dominant from the south;*
 - (vii) retains Upper Marsh and Royal Street as through routes;*
 - (viii) minimises traffic generation and includes parking provision to support health uses."*
4. We do not consider that including a prescriptive narrative in respect of heights to this part of the Site is necessary as the Site is located within a Conservation Area. The wording of Policy 22 in respect of Conservation areas sets out that proposals should respect and enforce the positive characteristics of the area in terms of the building line, siting and height.
 5. Any application for development on that part of the Site would be subject to an assessment of the impact of the proposed development on the significance of designated and non-designated heritage assets, townscape impacts and impact on the views from Archbishops Park.
 6. An assessment of potential acceptable heights has not been carried out or tested by the Local Planning Authority for this part of the Site in the Draft Local Plan and therefore it is considered that stipulating arbitrary heights without a full assessment could be unduly restrictive. Particularly as the site is protected by heritage and design policies already, and any application would submit full assessments to be considered by the Local Planning Authority.



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7. It is therefore considered that point iii) could be removed. If it is decided that it should stay, then the introduction of further height restrictions should not be made as the Site is suitably protected through other policies.