

REF: MR/BH/DB/R00129

BY EMAIL ONLY: programmeofficer@carmeledwards.com

9th October 2020

Dear Sir / Madam,

**DRAFT REVISED LAMBETH LOCAL PLAN 2020-2035
ROK PLANNING ON BEHALF OF UNITE GROUP PLC (RESPONDENT NUMBER R046)
HEARING STATEMENT IN RESPONSE TO QUESTIONS (MIQ) RAISED BY THE INSPECTOR IN
DOCUMENT MF3 REGARDING MATTER 8 'QUALITY OF THE BUILT ENVIRONMENT' AHEAD OF
LAMBETH'S LOCAL PLAN EXAMINATION IN PUBLIC (EIP)**

I write on behalf of our client, Unite Group Plc, to submit a Hearing Statement in response to the Matters issues and questions (MIQ's) (Matter 8) raised by the Inspector within document MF3 dated 30th September 2020 regarding the Lambeth Local Plan Examination in Public (EiP).

Unite Students is the UK's leading manager and developer of purpose-built student accommodation (PBSA), providing homes for around 74,000 students in more than 177 purpose-built properties across 27 of the UK's strongest university towns and cities.

This hearing statement has been prepared further to the representations made throughout the preparation of the draft Local Plan, and specifically the representations made to the pre-submission version of the plan dated March 2020. This statement responds to the MIQs in relation to Matter 8 'Quality of the Built Environment'.

MATTER 8 – QUALITY OF THE BUILT ENVIRONMENT – 8.3 TALL BUILDINGS

There is no 'up front' definition of tall buildings in policy Q26 (tall buildings), although there is the table in the explanatory text (paragraph 10.147) and the range of heights which are set out in Annex 11. In view of the relative complexity of developments in parts of Lambeth and some very important townscape considerations, such as the Westminster World Heritage Site, is this approach both justified and realistic?

The London Plan Policy D9 is clear that development plans should define what is considered as a tall building for specific localities. Unite acknowledge that the updated draft Local Plan Policy identifies and distinguishes between south Lambeth and middle/north Lambeth, alongside the height parameters of what is considered as a tall building.

However, given the fact that the borough includes the Vauxhall, Nine Elms and Battersea Opportunity Area (VNEBOA), and given the strategic emphasis on delivering employment and residential uses through high density developments, Unite recommend this OA is identified separately to the above areas within supporting draft policy text (10.147).

In terms of the plan at Annex 11, and specifically the Vauxhall Area, the areas considered as sensitive have been reduced and are now termed 'appropriate' for tall buildings by the GLA, including the identification of specific localities and addresses. It is acknowledged that significant development for tall buildings has come forward at pace in the VNEBOA in recent years. However, given the area is clearly

appropriate for tall buildings by virtue of the planning consents granted (and currently under construction), it is not justified to reduce and remove the previously adopted (Local Plan 2016) areas identified as appropriate for tall buildings.

Removing this wider area identified as appropriate for tall buildings simply contradicts the long-held planning policy aspiration for tall building development and significant growth within the opportunity area. Indeed, this aspiration remains for the VNEBOA which is identified to deliver 18,500 homes and 18,500 new jobs in the new London Plan period (Table 2.1).

It is acknowledged that Topic Paper 8 states that “appropriate tall building locations identified on the Annex 11 maps are based on careful 3D analysis on height and visual impact only”. However, there are much wider relevant considerations to take into account when assessing appropriate locations for tall buildings, including heritage impact assessments, heritage appraisals, townscape visual impact assessments and the like. Draft London Plan Policy D9 is clear that the requirements for an assessment of the impact of tall buildings extend well beyond the 3D analysis that Lambeth have undertaken in isolation, which is limited to height and visual impact only.

Therefore, the Council's justification for identifying specific locations for tall buildings within the VNEBOA on the basis of 3D analysis only (limited to height and visual impact) is unsubstantiated, conflicts with the strategic policy emphasis, and will restrict the delivery of high density development in these locations.

On this basis, and given the strategic position of the opportunity area, we would recommend that policy Q26 distinguishes the VNEBOA in the supporting policy text table at 10.147. In addition, the areas identified as appropriate for tall buildings in Vauxhall (Annex 11) should revert to the areas identified as appropriate for tall buildings in the adopted Local Plan (2016), as it is clear that the sites specifically identified for tall buildings have not been assessed rigorously and in accordance with the strategic principles as set out in the London Plan.

Does the range of definitions for tall buildings provide some consistency for development management purposes, and if not, what would be appropriate for Lambeth? [Some London Boroughs specify a number of storeys or heights as a yardstick]

Unite would question the inclusion of prescriptive storey heights in this policy for the following reasons, on the basis that there are wider factors to consider:

1. Storey heights can vary substantially for various uses depending on floor to ceiling heights;
2. A blanket height will result in all development being the same height or very similar; and
3. The assessment of a tall building should be based on contextual analysis;

Therefore, Unite support the inclusion of the identified ranges for tall buildings in the measurement of metres. However, having consideration to the comments made above prescriptive storey heights should not be included.

There is no inclusion of any criteria in the policy to relate tall buildings to public transport accessibility, which is a crucial relationship; in this regard, should the policy relate to PTAL levels, and if so, how?

Unite strongly support the inclusion of reference to the relationship between the development of tall buildings in accessible localities, on the basis that this is a key strategic planning policy consideration.

Draft London Plan Policy GG2 part C 'making the best use of land' states that development must "proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling".

Therefore, with reference to the VNEBOA, which is incredibly well connected, the area as a whole should be considered appropriate for tall buildings as per the comments above and the adopted Local Plan position.

We would therefore agree with the Inspectors suggestion that there is an additional requirement added to policy Q26 to make reference to tall buildings being appropriate in well-connected localities.

How valid are the concerns that tall buildings cause alienation, e.g. in relation to daylight, overshadowing, mutual privacy, microclimate, wind deflection and turbulence, and impact at street level, or is this a matter that can be overcome by sensitive design?

Unite defer to the strategic planning policy position (Draft London Plan Policy D9) and the requirements set out including visual impact, functional impact, environmental impact and cumulative impact. These factors are considered and rigorously assessed within any planning application for a tall building. The strategic importance of the delivery of tall buildings should not be overlooked in light of the above concerns which, as stated above, would be considered in any planning application.

Is the presumption against tall buildings in certain areas in Lambeth consistent with national policy?

Unite reinforce that the comments made above with regards to the VNEBOA, including the fact that very limited localities have been identified as appropriate for tall buildings which is contrary to both national and strategic planning policy to deliver significant housing and employment growth in opportunity areas. The NPPF seeks to make effective use of land and achieve appropriate densities. Therefore, restricting the location for tall buildings is in clear conflict with NPPF paragraphs 122 and 123.

We trust this Hearing Statement will be considered for the Examination in Public. If you should have any questions in the meantime please do not hesitate to contact Bethan Hawkins on 07849 848236 or (bethan.hawkins@rokplanning.co.uk), or myself at this office.

Yours sincerely,



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