

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 9 'PLACES AND NEIGHBOURHOODS' 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 9) 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 9 'Places and Neighbourhoods'.

MATTER 9 – PLACES AND NEIGHBOURHOODS

Are the following policies positively prepared, justified, effective and consistent with national policy?

Relevant draft Policy - Policy PN2 (Vauxhall): including Site 10 (Albert Embankment and land to the rear bounded by Lambeth High Street, the railway viaduct and Southbank House, SE11), **Site 11 (Keybridge House, 80 South Lambeth Road, 10-22 Wyvill Road (even) and 143-162 Wandsworth Road (odd), SW8 1RG), Site 12 (Land bounded by Wandsworth Road to the west, Parry Street to the north and the railway viaduct to the east, SW8), Site 13 (Plot bounded by Parry Street, Bondway and 7-93 Wandsworth Road, SW8 [Vauxhall Island Site])**.

With regards to Site Allocation 11 (bold), Unite make the following representations:

1. The Council have proposed no revisions to the draft strategic policy (Site Allocation 11), despite the fact that there have been a number of consents granted for mixed use including employment and residential uses. These have been predominantly Use Class C3, of which some have been completed, currently under-construction and unimplemented. Lambeth's Housing Provision Statement (August 2020) identifies for this site allocation (11) the following:
 - a. Completed: Keybridge House - 53 resi units in 2017/18, 246 resi unit in 2018/19, 123 resi units in 2019/20;

- b. Under-construction: Keybridge House -172 resi units in 2020/21 & 125 resi units in 2021/22;
 - c. Unimplemented: 12 – 20 Wyvil Road – 23 resi units in 2023/24 & 255 resi units in 2024/25 (this falls within site 11).
2. The site's located within the CAZ and Vauxhall Nine Elms Battersea Opportunity Area, draft London Plan policy SD1 part 5B-2 requires Opportunity Areas to fully realise their growth and regeneration potential, in particular that development should be supported that creates employment opportunities and housing choice for Londoners;
 3. Therefore, to ensure that the growth is realised for those sites which have not come forward for redevelopment within site allocation 11, it is recommended that that the preferred uses are updated to diversify the residential uses and particularly include for Large-scale purpose-built shared living, Build to Rent and purpose-built student accommodation;
 4. As detailed within the Council's draft policy H13, there is a policy preference for Large-scale purpose-built shared living in Vauxhall. Whilst the policy does not explicitly state residential uses, identifying Use Class C3, the draft site allocation should explicitly include for other residential uses to increase housing choice for Londoners in line with the strategic planning policy position;
 5. As acknowledged by the Council, Vauxhall is a suitable location for Large-scale purpose-built shared living and given the fact that conventional residential development (Use Class C3) is being delivered within the wider site allocation, a diversified residential offer will assist in creating mixed and balanced communities, in accordance with both strategic and national planning policy;
 6. In addition, part xii, regarding building heights should be removed as is it clear from the developments consented that these have not been transitional in height to the south, which is apparent from the extant consent at 12 – 20 Wyvil Road (LPA REF. 16/05114/FUL), therefore this part of the site allocation is ineffective and not in accordance with the strategic policies, which identify these locations for significant growth to deliver employment uses and housing;
 7. It is therefore recommended that Site Allocation 11 is updated to explicitly include a range of residential uses; including Large-scale purpose-built shared living, Build to Rent and purpose-built student accommodation, to ensure it is positively prepared, justified, effective and consistent with national policy.

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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