

## Tell us who you are

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**Ref: R019**

**Title**

Other

Preferred title (optional)

Dr

**First name**

Malcolm

**Surname**

Hockaday

**Email address**

malcolmhockaday@uandiplc.com

## Agent's details

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### Are you an agent?

Yes

No

### Title

Dr

### First name

Malcolm

### Last name

Hockaday

Job title (optional)

Planning Director

### Organisation

U and I Group PLC

### Address

7a Howick Place

### Postcode

SW1P 1DZ

### Contact number

0207 828 4777

Email address (optional)

malcolmhockaday@uandiplc.com

## Representors details

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**Title**

Dr

**First name**

Malcolm

**Last name**

Hockaday

**Organisation**

U and I Group PLC

## Your representation

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Please complete this set of questions for each representation you wish to make.

**To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? (identify specific reference if possible)**

- Paragraph number
- Policy number
- Policies Map - map and/or table number

**Please state policy number**

ED3

**Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:**

**Legally compliant**

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

**Sound**

- Yes
- No

**For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:**

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

**Please state why it is not justified**

Site Allocation and KIBA designation

Of substantial relevance to these representations:

- a) the current LB Lambeth Local Plan allocates the entire LFC site for redevelopment (Policy for Site 10); and
- b) the central and east sites fall within the Southbank House and Newport Street Key Industrial and Business Area (KIBA).

The existing adopted Local Plan allocation for the site states that the preferred use comprises:

**"Retention/provision of an operational fire station. Mix of uses including residential and employment. Exceptionally, configuration of the site to include some residential within the KIBA boundary may be considered, if it can be demonstrated that this is necessary to achieve an acceptable scheme in all other respects. The amount of replacement employment should be maximised and should include space for small and medium enterprises."**

However, U+I and LFC were pleased to receive the support of LB Lambeth and the GLA to bring forward this required mixed-use redevelopment of the 8 Albert Embankment site with a replacement fire station, a London Fire Brigade Museum, offices (including discount market rent) and other employment spaces, retail, a hotel, residential (including affordable) and public open space.

We note that the Council is already suggesting variation of the boundaries within the Montford Place - Beefeater/Oval Gasworks KIBA to reflect development management decisions. However, whilst the December 2019 KIBA review by the Council records the support given to the U+I/LFC mixed use scheme, it ultimately alternatively recommends no change to the boundary.

Such an approach is inconsistent and, ultimately, unsound. With the proposed wording of the main KIBA policy ED3 now excluding business uses as appropriate within KIBA and with the Council's support for Class B1(a) office use as the major employment generator on the Central part of the

U+I/LFC site (reflecting its CAZ location), the boundaries as currently suggested are therefore clearly not appropriate. The U+I/LFB Parcels 2 and 3 as noted in the KIBA Review document should therefore be excluded from the KIBA designation and the relevant Map adjusted accordingly.

### **Complies with the Duty to co-operate**

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

As noted above - removal of parcels 2 and 3 from further designation as KIBA.

Revise wording and description to exclude Class B1(a) Business use from policy.

**Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.**

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.**

**If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, do you consider it necessary to participate at the oral part of the examination?**

No - I do not wish to participate at the oral examination

Yes - I do wish to participate at the oral examination

Your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

## Your representation 2

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**Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?**

- Yes
- No

**To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)**

- Paragraph number
- Policy number
- Policies Map - map and/or table number

**Please state policy number**

PN2 Site 10

**Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:**

**Legally compliant**

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

**Sound**

- Yes
- No

**For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:**

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- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

**Please state why it is not justified**

Provides unnecessary limitations to development out of accord with London Plan

**Complies with the Duty to co-operate**

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

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(optional)

In addition to comments on Policy ED3, the identification of parcels 2 and 3 for Site 10 (as noted in KIBA Review 2019) as being with potential for both intensification and co-location with residential and other uses would be a minimum requirement.

In passing, with the deletion of the suitability of 'business' uses within what has been KIBA, the use of the term KIBA itself also becomes inappropriate and a revised designation term should be applied to better reflect the effective LSIS approach from the London Plan (existing and proposed).

U+I welcomes the continued Policy PN2 allocation of 8 Albert Embankment for mixed residential and employment uses.

However, with the recent Council support for the proposed heritage-led mixed-use scheme, we request that the site allocation is updated for consistency:

- Ownership – update site ownership to London Fire Commissioner (LFC) to reflect the abolishment of the London Fire and Emergency Planning Authority
- Current use – update to confirm that The Workshop is currently permitted for temporary D1/B1 uses
- Preferred use – update to align with revised KIBA policy (as requested above) and expand to include a London Fire Brigade Museum (in line with the Mayors' Draft Cultural Strategy)
- Planning history – update to refer to Council-supported application reference 18/04185/VOC and
- Design principles and key considerations – update to note that the Central Site is suited to well-designed buildings of up to 90m.

In addition, we note the revised and more positive approach of identifying particularly suitable locations for tall building rather than the previous approach of the existing policy maps identifying areas "inappropriate for tall buildings".

All three parcels of the 8 Albert Embankment site were previously identified as being "sensitive for tall buildings", with the site allocation (Policy PN2 Site 10) which notes that "the heritage sensitivity of the site makes it inappropriate for tall building development". The Central site is now identified as suitable for buildings of up to 90m AOD. The West and East Sites do not fall within the area identified for buildings of up to 90m AOD.

U+I supports the Council's recognition of the appropriateness on the U+I/LFB Central site on Lambeth High Street for suitably-designed buildings which meet the policy criteria and at up to 90m height. This approach therefore needs to be recognised in Annex 11, with an additional location being shown on the Vauxhall plan and an additional inclusion in the specified Locations list set out below it.

As recorded above and for consistency, the site allocation (PN2 Site 10) should be updated to acknowledge that the Central Site is regarded as suitable for buildings up to 90m in height.

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- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

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## Your representation 3

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**Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?**

- Yes
- No

**To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)**

- Paragraph number
- Policy number
- Policies Map - map and/or table number

**Please state policy number**

ED13

**Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:**

**Legally compliant**

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

**Sound**

- Yes
- No

**For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:**

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- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

**Please state why it is not justified**

U+I supports the overarching principle of Policy ED13 that seeks to promote, safeguard and improve leisure, recreation, arts and cultural facilities and agrees that such uses should be directed towards the CAZ, Vauxhall and Waterloo Opportunity Areas and town centres.

U+I notes that the revisions in Annex 10 specify that planning obligations will be sought to address any additional public service provision and maintenance required as a result of a development. However, we object to the suggested approach set out within Annex 10 which identifies that the contributions will arbitrarily be "based on impact in relation to 1% of turnover, or another sum agreed" rather than on any true costs.

**Complies with the Duty to co-operate**

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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(optional)

As above

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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**If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, do you consider it necessary to participate at the oral part of the examination?**

- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

Your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

## Your representation 4

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Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

Yes

No

## Require further notification

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Please tick relevant boxes if you require notification of any of the following to the address stated previously in personal/agent details

(optional)

- That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination
- The publication of the inspector's recommendations following the independent examination
- The adoption of the Revised Lambeth Local Plan and Policies Map.

## Review your answers

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### Review your answers

Before submitting your form you can review all of the answers you have given so far by clicking on the link below.

[Open a read only view of the answers you have given \(this will open in a new window\)](#)

### Declaration

By submitting this claim you are agreeing to the following declaration. To view this declaration please click on the link below

I declare that the information I have provided on this form is accurate

Now submit your form using the submit button below.