

Pre-Submission Publication Representation Form



Ref:	R035	(for official use only)
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Name of the document (DPD) to which this representation relates:

Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV Jan 2020) and associated Proposed Changes to the Policies Map January 2020 (PCPM Jan 2020)

Please return to: localplan@lambeth.gov.uk
 or by post: Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG
 by 11pm on 13th March 2020.

Please read the Guidance Note and Privacy Notice attached to this form before completing the representation form or submitting your comments

This form has two parts –

Part A – Personal details (please see applicable privacy notices in Section 5 of the guidance note)

Part B – Your representation(s). Please fill in a separate sheet for each part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you wish to make a representation about.

Part A

1. Personal details*

2. Agent's details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title		MR
First name		GIUSEPPE
Last name		CIFAIDI
Job title†		ASSOCIATE
Organisation†	BELLWAY HOMES	SAVILLS
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† where relevant

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7. 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 in Q3 legally compliant or sound, having regard to the test you have identified in Q5 above where this relates to soundness. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why this change will make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of this part of policy or text. Please be as precise as possible.

<p>PLEASE REFER TO COVER LETTER</p> <p><i>(if required continue on the additional comments page attached)</i></p>

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.

8. If your representation is seeking a change to the DRLLP PSV Jan 2020 or associated PCPM Jan 2020, 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

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

<p><i>(if required continue on the additional comments page attached)</i></p>

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

10. Please tick relevant boxes if you require notification of any of the following to your address stated in Part A:

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.

Signature



Date

13.03.20

10 March 2020



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Dear Sir / Madam

**Representations to Lambeth's Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020) Regulation 19 Consultation
Geoffrey Close Estate**

Thank you for providing us with the opportunity to engage with the Regulation 19 consultation on the Council's Local Plan Review. I write on behalf of our client, Bellway Homes Limited (London Partnerships) and Riverside Group, who has an interest in the above site.

Below, I set out a brief summary of the context of the site before turning to specific comments on the consultation document.

Context

The Geoffrey Close Estate is located in the east of the Borough, to the northeast of Loughborough Junction Station. The estate is bound by Lilford Road, Flaxman Road, Kenbury Street and the rear of development that faces on Coldharbour Lane. There are 134 social rented dwellings on the estate contained within buildings three to four storeys in height.

The existing estate suffers from overcrowding and much of the accommodation is in need of significant refurbishment. The existing estate comprises a small community room and 134 social rented units / 383 habitable rooms as follows:

Unit Size	Number of Units	Habitable Rooms
1B1P	18	18
1B2P	28	56
2B4P	45	135
3B4P	42	168
4B7P	1	6
TOTAL	134	383

There are 38 parking spaces existing on site with 60+ cars currently parking on the site.

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There is 683sqm of existing public open space on site, including a ball court. The existing open space is all hard standing which has been left open to misuse and anti-social behaviour and is very rarely used by existing residents.

The proposals to redevelop the site includes decant and re-provision strategy of the existing social rented units. This is currently going through pre-application with Officers at the Local Planning Authority and the GLA. These representations are submitted in the context of the estate renewal currently being proposed at Geoffrey Close Estate. We have some concerns about several of the policies (and supporting text), which in their current form are likely to inhibit, rather than accelerate growth.

Comments on the Consultation Document

Policy H11 Estate Regeneration

Within the Regulation 19 document we note that the Council has introduced a new policy regarding Estate Regeneration. The draft Policy states;

“...estate regeneration schemes must achieve at least 50% affordable housing in the final scheme, based on habitable rooms. Applicants should demonstrate they have sought to maximise the proportion of affordable housing in the scheme and should where possible provide more than 50%.

Existing affordable housing floorspace on estate regeneration schemes should be replaced on an equivalent basis, i.e. where social rented floorspace is lost, it should be replaced by general needs rented accommodation with rents at levels based on that which has been lost.”

Bellway and Riverside are concerned with the wording particularly in relation to the requirement to achieve at least 50% affordable housing, as this position does not take into account the viability of a scheme. We also note how this approach differs from the wording and advice in the new London Plan (Intend to Publish version) (2019) and the Mayor’s Good Practice Guide to Estate Regeneration (2018).

The London Plan’s Intend to Publish (2019) at draft Policy H8 expressly refers to development proposals to follow the viability tested route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace. The Mayor’s Good Practice Guide to Estate Regeneration (2018) refers to seeking an uplift only. It is clear that the two documents do not set a prescriptive figure.

Bellway and Riverside have concerns in relation to setting a prescriptive approach in relation to a 50% minimum for affordable housing. Each regeneration scheme is different, and will come with its own challenges. It is extremely expensive, particularly with a single decant approach and relocation strategy in-place, with viability being a key deterrent as to whether it can be delivered.

In the case of the Geoffrey Close Estate the construction programme is anticipated to be around 62 months with all market units being disposed at around January 2025. Therefore, it is not expected to achieve any margin until further down the project timetable. There is a high degree of risk associated with a phased project of this length.

Viability can change over time as a result of external factors such as build costs or market changes and consequently, there is a very fine balance around viability considerations. A scheme needs to be viable to be delivered particularly in estate renewal schemes. As such, we consider that the policy should be adjusted to remove the 50% requirement and align with the London Plan and Good Practice Guide and make it clear that any additional affordable should follow the viability tested route.

Bellway has concerns about the implications of policy which states that for estate regeneration schemes the existing affordable housing floorspace should be replaced on an ‘equivalent’ basis. In our experience, there are often reasons why re-provision on a different tenure might be appropriate. One of the main drivers leading to estate regeneration is the need to better meet the needs of the existing community. Meeting these needs often

gives rise to a different tenure composition, to benefit the community. For example, there could be a very real need for households to require larger premises to meet their needs.

We consider that rebalancing of stock is often essential in the success of a regeneration scheme. The blanket equivalent replacement policy could potentially hinder the ability to meet the needs of the existing community and achieve wider regeneration objectives.

We therefore consider that there is a need to be more flexible in Lambeth's policy seeking affordable housing to be replaced on an equivalent basis.

Policy H5: Housing Standards

Within the Regulation 19 document we note that the Council has amended the wording to Draft Policy H5. It is welcomed that the wording of draft Policy H5 is less prescriptive for the private amenity space standards in relation to houses, which should generally provide 30 sqm. This implies an element of flexibility in the provision of private amenity space, taking account of wider site constraints and other associated benefits of a scheme. We support this direction of travel.

However, we would encourage a similar flexible approach to be applied to the Council's guidance for flatted schemes. We consider that the policy should be less prescriptive and follow the approach set out in the New London Plan (Intend to Publish) which does not set a figure for amenity space but states (at Table 3.2) '*private amenity space for each dwelling should be useable have a balance of openness and protection, appropriate for its outlook and orientation.*'

There are likely to be some instances where the prescriptive standards proposed by Lambeth (i.e. 10 sqm private amenity space per dwelling) cannot be met. Nonetheless in redevelopment schemes balconies or terraces of sufficient size and quality would still be provided and these would arguably provide meaningful useable amenity space.

The policy therefore does not necessarily need to be subject to a prescriptive standard, particularly if a smaller well thought-out provision of amenity could provide a high quality space in accordance with the London Plan's aforementioned guidance.

Within the Regulation 19 document we note that the Council is maintaining its policy requirement for a further 50 sqm of communal amenity space per scheme. In our experience, within constrained smaller sites, particularly on smaller flatted schemes, it is not always feasible to deliver this additional 50 sqm communal space requirement in addition to the 10 sqm of amenity per flat.

As such, in our experience, where the site is constrained the delivery of the 50 sqm of shared amenity is often not usable or at a high quality and provided at underused areas simply to meet the policy target. We have concerns with the Council maintaining this policy position, and advise that a flexible approach to shared amenity should be adopted.

Policy EN1 Open Space

Within the Regulation 19 document we note that Council will seek to protect open space and green infrastructure. The draft policy advises that development which involves the loss of existing public or private open space will not be supported unless: (i) replacement open space of equivalent or better quality and quantity is provided within a suitable location in the local area (ii) or in the case of housing estate amenity areas, significant regeneration and community benefits would be achieved that could not be achieved in any other way, and appropriate compensatory provision for the loss of open space is made, including improvements to the quality of the remaining open space.



Whilst this policy does allow the loss of communal estate amenity in some instances which is supported. However, through our experience, the policy should differentiate and take into account whether the open space being lost is truly an accessible space and in active use.

There are instances in Lambeth where amenity space has been developed over or become unusable after a number of years of disuse, and generally become overgrown with vegetation. In these instances, where the proposals involve the loss of estate amenity space which is not currently in use or public accessible, it should not be subject to the criteria set out in Policy EN1 as it is not reasonable to hinder growth in favour of new open space where the existing open space has not been used nor contributing to the Borough's openness or green infrastructure.

Future Participation

I trust that the above is of assistance in the preparation of the new Local Plan. I would be grateful for confirmation of receipt of these representations and would welcome the opportunity to engage with further versions of the new Local Plan in the future. If you have any queries or would like to discuss, please don't hesitate to get in contact with me.

Yours faithfully

Giuseppe Cifaldi
Associate

Enc. As above

cc. James McConnell, Bellway Homes (London Partnerships)
Jack Beard, Bellway Homes (London Partnerships)
Sophie Lejeune, Riverside
Steven McIntosh, Riverside
Kieran Wheeler, Savills