



Ref: R043

Stratford Office
29-35 West Ham Lane
London E15 4PH

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

Planning, Policy and Strategy
London Borough of Lambeth
Via Email

13th March 2020

Dear Sir/Madam,

L&Q Representations on Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020)

Please find enclosed representations submitted in respect to the Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020) from London and Quadrant Housing Trust (“L&Q”).

L&Q is one of the UK's leading housing associations and one of London's largest residential developers. We own or manage over 100,000 homes in London and the South East and have an ambitious target of building or enabling the construction of 100,000 new homes in the next 10 years.

L&Q are a long-established landlord and developer in Lambeth, currently managing over 3,700 homes in the Borough, and therefore have a long-term interest of ensuring that the new Lambeth Local Plan is successful. It is on this basis that L&Q welcome the opportunity to submit representations on the Draft Revised Lambeth Local Plan Proposed Submission Version (from herein “the Draft Plan”).

Key Points

L&Q responded to the previous round of consultation on the Draft Revised Local Plan (October 2018) in December 2018 (copy appended). Where policies have not been amended since that consultation, our previous representations remain valid. The detailed representations below focus on those new or amended policies since the previous consultation.

We welcome the Draft Plan's continued objectives to ‘accommodate population growth’ to increase the mix and quality of housing to address the need for all types of housing, including affordable housing and the needs of different groups in the community.

Detailed Representations

Policy H1 - Maximising Housing Growth

L&Q strongly support the Council's aspirations of maximising the supply of additional homes in the Borough to meet and exceed the annual housing target set out in the London Plan for the period of 2019/20 - 2028/29. L&Q support the new policy text at H1(i) regarding the



Stratford Office
29-35 West Ham Lane
London E15 4PH

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

potential for housing to be delivered on all suitable and available brownfield sites, including through estate regeneration.

Lambeth's historic estates, as well as other estates managed by housing associations, often do not reflect the existing and emerging densities in central areas of the Borough. Estate regeneration projects can enable the delivery of higher quality replacement homes for existing residents as well as additional homes meeting Lambeth's housing need.

Policy H2 - Delivering of Affordable Housing

L&Q support Lambeth's commitment to maximise affordable housing provision in the Borough.

We welcome the proposed amendments to Policy H2 to bring it in line with the Mayor's threshold approach (draft London Plan Policy H6) and create a consistent and certain approach in respect to affordable housing and viability.

We support the threshold approach to viability that enables schemes exceeding the threshold to progress quickly through the planning system, without the need for detailed viability information or comprehensive review mechanisms. We also welcome the introduction of flexibility at H2(a)(v) regarding the tenure split between affordable rented housing and intermediate products when provided above the required threshold level. This will enable developers to maximise their affordable housing offer.

The NPPF definition of Affordable Rent as up to 80% of the local market rent is not affordable to many Londoners, and we therefore welcome the replacement of this term in H2(a)(iv) with 'low cost homes for Londoners on low incomes' (social rent/ London Affordable Rent). The Council will however be aware that there is a difference between Social Rent and London Affordable Rent levels and the rental product to be delivered could impact the overall affordable offer.

Supporting paragraph 5.30 set out the Council's view that in areas where market sales values exceed £600,000, LLR should be the intermediate product provided. The current and emerging London Plan recognises shared ownership as an affordable tenure meeting the need of a certain part of the population that cannot access to homeownership on the private market. Whilst we appreciate in certain high value areas, those able to afford shared ownership may reduce

L&Q consider site specific circumstance may justify the introduction of shared ownership in such areas as they meet the housing need of certain households with an annual income of less than £90,000 and support the viability of developments. We consider that appropriate restrictions to ensure affordability are achieved through the HCA's shared ownership affordability calculator, which requires that no more than 45% of a household's net household income should be used to support the purchase of the shared ownership property. We consider such measures more appropriate than a blanket £600,000 cap.

Policy H4 – Housing Size Mix in New Developments



Stratford Office
29-35 West Ham Lane
London E15 4PH

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

Draft New London Plan Policy H10 sets out that boroughs should only set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for low-cost rent homes. L&Q welcome the proposed update of the Draft Plan Policy H4 to reflect this position and to allow the market to determine the best mix for private and intermediate homes.

L&Q is aware of the need for family housing in London and support the provision of 3 + beds homes in the right schemes and locations. We welcome the amendment to policy H4(a)(i) to reflect the latest SHMA and the supporting text to the policy at 5.43 which recognises rigid application of these requirements may not be appropriate in all cases.

We would also encourage the Borough to recognise, as per the draft New London Plan approach, that 2B4P homes can contribute towards family housing provision.

Policy H11 – Estate Regeneration

L&Q recognise that the regeneration and intensification of existing housing estates are a key contributor to meeting housing needs and delivering safe and better-quality homes for residents and that on such schemes the quantum of affordable housing should be maximised.

L&Q support Lambeth's ambition to ensure estate regeneration schemes achieve 50% affordable housing. We also support that this is measured on a habitable room rather than unit basis, to reflect the often-high quantum of family home re-provision on estate regeneration schemes.

However, we would highlight that scheme specific requirements of estate regeneration projects including, inter alia temporary and permanent re-housing costs, home loss and 'disturbance' financial packages, buy-backs and often significantly improved social infrastructure, the ability to provide 50% of homes as affordable can be challenging.

We consider that the policy should be amended to align with draft new London Plan Policy H8 which seeks to maximise the proportion of affordable housing in the scheme any uplift in affordable housing rather than set a prescriptive 50% target. We would propose Policy H11(a) is amended as follows:

Estate regeneration schemes should demonstrate they have sought to maximise the proportion of affordable housing in the scheme.

L&Q support the Council's objective to achieve an appropriate mix of low cost rented and intermediate affordable units in estate regeneration schemes and that in such instances flexibility from Policy H2 should be allowed to enable mixed and balanced communities.

L&Q note the supporting paragraph 5.106 requires proceeds of the sale of shared ownership units within estate regeneration project to be retained by Homes for Lambeth. We seek clarity this would only applies on Lambeth owned estates. L&Q raise significant concern if



Stratford Office
29-35 West Ham Lane
London E15 4PH

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

the Council are suggesting this occurs on all estate regeneration schemes. Proceeds from staircasing are factored in financial appraisals and diverting this revenue from the “developer” could significant impact scheme viability and thus the affordable offer and/or deliverability of a project.

Policy T3 – Cycling

L&Q recognise the importance of delivering sufficient cycle parking provision to promote cycling, however, we object to the part (f) requirements for 25 per cent of cycle parking provision to be Sheffield stands. Sheffield stands significantly increase the floorspace requirement of cycle stores placing increasing pressure on available ground floor space, especially in high-rise developments, resulting in: (i) less active frontage at street level; and (ii) larger podiums which increase build costs.

Whilst L&Q recognise the need to provide for a range of users, including adapted cycles for disabled use and electric bikes we consider the proposed requirements onerous and overestimates demand. Evidence on disabled and electric cycle demand/ ownership should be provided to support this policy.

We consider monitoring obligations, secured through a Travel Plan or otherwise, would better allow the Council and developers to collect data on actual demand and regularly review policy requirements accordingly Similarly to the draft New London Plan approach on disabled car parking, applicants could provide detail on how future disabled persons cycle parking spaces will be made, managed and enforced should demand arise.

Conclusions

L&Q welcome the opportunity to comment on Lambeth’s Draft Plan. We welcome amendments to bring the existing plan for the Borough up to date and consistent with new and emerging new national and regional planning policies.

However, we would request the proposed amendments in respect to shared ownership products, estate regeneration and cycle parking are reviewed to ensure they are justified, based on proportionate evidence and consistent with the soon to be adopted New London Plan.

I trust the above representation is helpful and will be given due consideration. If you require further information or clarification, please do not hesitate to contact me.

Yours Faithfully,

Rachel Ferguson
Head of Design & Planning – London South
L&Q



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

17th December 2018

Planning, Policy and Strategy
London Borough of Lambeth

Submitted via Email

Dear Sir/Madam,

DRAFT REVISED LAMBETH LOCAL PLAN (2018) REPRESENTATIONS FROM LONDON AND QUADRANT HOUSING TRUST

Please find enclosed representations submitted in respect to the Draft Revised Lambeth Local Plan (October 2018) from London and Quadrant Housing Trust (L&Q).

L&Q is one of the UK's leading housing associations and one of London's largest residential developers. We own or manage over 95,000 homes in London and the South East and have an ambitious target of building or enabling the construction of 100,000 new homes in the next 10 years.

L&Q are a long-established landlord and developer in Lambeth and therefore have a long-term interest in ensuring that the new Lambeth Local Plan is successful. It is on this basis that L&Q welcome the opportunity to submit representations on the Draft Revised Lambeth Local Plan.

KEY POINTS

We welcome the Draft Revised Local Plan continued objectives to “accommodate population growth” and to “increase the mix and quality of housing to address the need for all types of housing, including affordable housing and the needs of different groups in the community”.

DETAILED REPRESENTATIONS

Policy D1 - Delivery and Monitoring

L&Q welcome the Council's approach to work with a range of partners to ensure use of previously developed land and vacant buildings are optimised. We hope to work with the Council to help achieve their strategic objectives over the Plan period.



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

Policy H1 - Maximising Housing Growth

L&Q strongly support the Council's aspirations of maximising the supply of additional homes in the Borough to meet and exceed the annual housing target set out in the London Plan for the Plan period. L&Q support the revised policy text at H1(i) regarding the potential for housing to be delivered on all suitable brownfield sites, including through estate regeneration.

Policy H2 - Delivery of Affordable Housing

L&Q support Lambeth's commitment to maximise affordable housing provision in the Borough.

We welcome the proposed amendments to Policy H2 to bring it in line with the Mayor's threshold approach (draft London Plan Policy H6) and create a consistent pan-London and certain approach in respect to affordable housing and viability.

We support the threshold approach to viability that enables schemes exceeding the threshold to progress quickly through the planning system, without the need for detailed viability information or comprehensive review mechanisms. However, in instances where developments are required to deliver substantial investment in infrastructure and social infrastructure, a reduction in affordable housing or variation from the preferred tenure split may be necessary. We therefore consider that development viability cannot be excluded as a consideration of the nature of affordable housing sought and the text "including development viability" should be re-instated at H2(c)(i).

We welcome the continued clarity on Lambeth's preferred tenure mix at H2(a)(iv). However, we consider there should be flexibility for an alternative tenure mix should be considered in the circumstances/ factors set out at H2(c).

The NPPF definition of Affordable Rent as up to 80% of the local market rent is not affordable to many Londoners, and we therefore welcome the replacement of this term in H2(a)(iv) with "low cost homes for Londoners on low incomes" (social rent/ London affordable rent). The Council will however be aware that there is a difference between Social Rent and London Affordable Rent levels and the rental product sought may impact the overall affordable offer.

Policy H4 – Housing Size Mix in New Developments

Draft New London Plan Policy H12 sets out that boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes. L&Q welcome the proposed revisions to Local Plan Policy H4 to reflect this position.

L&Q is aware of the need for family housing in London and support the provision of 3 + beds homes in the right locations and within family-friendly developments. We believe that



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

flexibility should be adopted for the minimum 35% requirement for 3 Bed + low cost rented homes. This would ensure that the delivery of family housing is maximised in suburban, low-density locations and minimised in high-rise, high density developments in locations that cannot meet families' needs.

We would also encourage the Borough to recognise, as per the draft New London Plan approach, that 2B4P homes can constitute family housing.

Policy H5 - Housing Standards

Dual Aspect

Whilst we consider residential development should maximise the provision of dual aspect dwellings, we object to wording of Policy H5(a)(i) that "new-build dwellings should be provided as dual aspect accommodation, unless exceptional circumstances are demonstrated".

Experience confirms that single aspect units can be designed to be high-quality accommodation if they meet the standards set out in the Mayor's Housing SPG. Including a proportion of single aspect homes in a development ensures that the overall capacity of a site to accommodate new homes can be optimised. The profound potential consequences of the suggested policy approach are a reduction in the number of homes being delivered which is contrary to the general thrust of the objectives of the draft Local Plan. Development costs will also increase, prejudicing the ability to deliver wider benefits, including affordable housing.

Private Amenity Space

L&Q recognise the importance of delivering private amenity space for residents, as a balcony/terrace, private garden or if these options are not feasible, through the consolidation of communal amenity space. Site characteristics and the local context of surrounding properties can hinder the delivery of large amounts of private amenity space, especially in high-density development. Therefore, L&Q encourage the Borough to adopt the London Plan's approach of providing a minimum of 5 sq. m private amenity space for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant, rather than a starting point of 10 sq. m per flat and 30 sq. m for houses.

L&Q support the Council's pragmatic approach to the provision of additional internal living space, in lieu of the private open space requirement where it is acknowledged that site environmental constraints can make it impossible to provide good quality private open space for all dwellings.



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

Policy H11 – Estate Regeneration

L&Q recognise that the regeneration and intensification of existing housing estates are a key contributor to meeting housing needs and delivering safe and better quality homes for residents and that on such schemes the quantum of affordable housing should be maximised.

L&Q support Lambeth's ambition to ensure estate regeneration scheme achieve 50% affordable housing in the final scheme. However, we consider that given the varying requirements of estate regeneration projects, including replacing existing accommodation with better quality accommodation on the same rental levels and often significant improvements to social infrastructure, viability can be constrained.

We consider that the policy should be amended to align with draft new London Plan Policy H10 parts:

- (a) Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace; and
- (b) Loss of existing affordable housing it should not be permitted unless it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace on an identical or equivalent basis.

L&Q support the Council's objective of achieving an appropriate mix of low cost rented and intermediate affordable units in estate regeneration schemes and that in such instances flexibility from Policy H2 should be allowed to enable mixed and balanced communities.

Policy ED1 – Offices (B1a)

L&Q welcome the proposed amendments to Policy ED1 (d) that the partial replacement of existing B1a floorspace in mixed use development will be considered acceptable where other significant planning benefits, such as a high proportion of affordable housing, are provided.

Policy ED2 – Affordable Workspace

L&Q acknowledge the need for affordable workspace in the Borough. However, we consider that on mixed use schemes providing other significant planning benefits, such as a high proportion of affordable housing, the affordable workspace requirements should be relaxed. The proposed policy wording should be amended to recognise this.

Policy ED3 & ED4 – Key Industrial and Business Areas & Non-designated industrial sites

L&Q support the identification of areas in KIBAs which could support co-location with residential uses. Draft policies ED3 and ED4 currently seek 50% affordable housing at most industrial sites. However, other policies in the draft Revised Local and draft London Plan



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

present other challenges to delivering viable schemes at such sites (including the requirements to re-provide or uplift Class B2 and/or B8 floorspace).

In practice, such developments will generally be subsidised by the market housing provided. As such seeking 50% affordable housing from such developments will disincentivise, if not preclude, such development being brought forward, especially given other viability considerations such as the cost of bringing such land into use (e.g. remediating contaminated land).

Policy T3 – Cycling

L&Q consider the current Local and London Plan cycle space standards are excessive and experience demonstrates there is much surplus capacity across developments delivered across London.

We have objected to the draft New London Plan's (Policy T5) which seeks to increase the long-stay cycle parking provision for C3, as this increase may:

- Occupy ground floor space (resulting in less commercial / active frontage);
- Result in more cycle parking space that will not be used by the occupiers of the development because of a lack of demand; and
- Result in additional cost that could be better spent elsewhere (e.g. Healthy Streets improvements).

The same points apply to the draft Revised Local Plan Policy T3.

Moreover, we object to the part (f) requirements for 25 per cent of cycle parking provision to be Sheffield stands. We also consider the requirement for 10% to be designed for disabled use at the outset to be overly prescriptive. Both these requirements will put significant further pressure on ground floor space and are likely to result in additional costs.

We consider the draft New London Plan approach on disabled car parking (Policy T6.1), which requires only 3% from the outset, to be a more appropriate position that could also be applied to cycles. In order to justify a higher 10% provision, an evidence base should be prepared to demonstrate that there is demand for disabled cycle parking.

L&Q also consider any requirements for electric cycle parking points should respond to an identified need in the Borough.

Policy T7 - Parking

L&Q support the Council's approach to adopting the London Plan maximum car parking standard for high PTAL locations. Whilst we understand the importance of providing an appropriate level of car parking for residents, we would encourage Lambeth to apply the London Plan policy for lower PTAL locations as well, to ensure consistency across London.



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

Policy EN1 – Open Space, green infrastructure and biodiversity

L&Q recognise the need for new major developments in areas of open space deficiency to provide on-site provision of open space. However, we would note that the provision of new public open space within a development, in addition to the Council's amenity space requirements, may impact service charges and hinder affordability. Therefore, we would encourage the council to be flexible on this policy and take into account site and scheme specific constraints.

Policy EN4 – Sustainable Design and Construction

L&Q welcome the alignment of proposed revised Policy EN4 with London Plan Policies SI1 Improving air quality, SI2 Minimising greenhouse gas emissions, SI4 Managing Heat Risk, SI5 C and E Water infrastructure.

The proposed required of revised Part (c) for new development to use the Home Quality Mark and Passivhaus design standards is however considered onerous. In 2015, the Government withdrew Code for Sustainable Homes in order to rationalise the many differing standards for energy and sustainability in favour of national technical standards. L&Q consider Building Regulations Part L and the policies of the draft New London Plan create sufficient regulation to ensure new build developments are sustainable and there is not a need to introduce further standards such as the Home Quality Mark and Passivhaus design standards. The adoption of these standards doesn't necessarily result in any further benefits to the sustainable design quality.

Policy EN7 – Sustainable Waste Management

L&Q understand that existing waste transfer and management sites for waste management use should be safeguarded unless appropriate compensatory provision is provided elsewhere. We consider, however, that compensatory provision should be looked at on a Pan-London basis rather than just 'elsewhere' in the Borough. This position is recommended in the Waste Evidence Base.

Policy Q26 – Tall Buildings

L&Q are generally supportive of the proposed amendments to Policy Q26.

It is however considered imperative, with the revised approach to part (a) (identifying areas appropriate for tall buildings, rather than areas inappropriate) that part (c) is introduced. L&Q believe that well-designed tall buildings can create new landmarks and contribute to the regeneration of neighbourhoods as well as the delivery of much needed homes.

CONCLUSIONS

L&Q support the Revised Draft Local Plan for Lambeth which will bring the plan up to date and consistent with new and emerging new national and regional planning policies.



Stratford Office
10 Grove Crescent Road
London
E15 1BJ

Tel: +44 (0)300 456 9998
Email: info@lqgroup.org
Website: www.lqgroup.org.uk

I trust the above representation is helpful and will be given due consideration. If you require further information or clarification please do not hesitate to contact me.

Yours Faithfully,

Rferguson

Rachel Ferguson
Head of Design & Planning – London South
L&Q