

Pre-Submission Publication Representation Form



Name of the document (DPD) to which this representation relates:

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

Ref:

R061

(for official use only)

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)

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	<input type="text"/>	<input type="text" value="Ms"/>
First name	<input type="text"/>	<input type="text" value="Catriona"/>
Last name	<input type="text"/>	<input type="text" value="Fraser"/>
Job title [†]	<input type="text"/>	<input type="text" value="Director"/>
Organisation [†]	<input type="text" value="Olympian Homes (c/o Turley)"/>	<input type="text" value="Turley"/>
Address	<input type="text"/>	<input type="text" value="Lacon House"/>
	<input type="text"/>	<input type="text" value="84 Theobald's Road"/>
	<input type="text"/>	<input type="text" value="London"/>
	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="WC1X 8NL"/>
Telephone	<input type="text"/>	<input type="text" value="020 7852 4010"/>
Email [†]	<input type="text"/>	<input type="text" value="catriona.fraser@turley.co.uk"/>

[†] where relevant

13 March 2020
Delivered by email

Planning Policy Team
London Borough of Lambeth
Town Hall
Brixton Hill
London
SW2 1RW

Ref: THEL3000

Dear Sir / Madam

SUBMISSION OF REPRESENTATIONS TO THE LONDON BOROUGH OF LAMBETH ON BEHALF OF OLYMPIAN HOMES

PRE-SUBMISSION REGULATION 19 CONSULTATION (FEBRUARY 2019) - DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020

We write on behalf of Olympian Homes with respect to the Regulation 19 consultation for the emerging Revised Lambeth Local Plan known as the 'Draft Revised Lambeth Local Plan Proposed Submission Version January 2020', ("the Draft Revised Local Plan").

This statement has specific regard to proposed policies within the Draft Revised Local Plan relating to the Vauxhall area policy and the development of Large-scale purpose-built shared living within the London borough of Lambeth ("LB Lambeth").

Olympian Homes

Olympian Homes has been trading since 1993 and specialises in sourcing and developing mixed commercial and residential sites. Within the Olympian Group of Connected Companies it has conceived and /or delivered some 40 projects during the past 27 years, involving over 3.5m sqft of mixed development. Olympian has a proven track record in delivering end to end property development solutions for commercial end users and tailored, well designed apartments encompassing a range of state of the art options for today's urban dwellers.

Specifically, Olympian Homes have an interest in a site on Wyvil Road, that forms part of Strategic Allocation Site 11 (Keybridge House, 80 South Lambeth Road, 10-22 Wyvil Road (even) and 143-161 Wandsworth Road (odd) SW8 1RG) and lies within the Vauxhall area. The site has an extant residential planning permission (soon to lapse later this year), which remains unimplemented and undelivered, demonstrating clear viability issues at the site.

Whilst Olympian Homes are not making reps against this site allocation through these representations on the Proposed Submission Version of the Revised Lambeth Local Plan, they will be making representations against it as

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part of the consultation on a revised Site Allocations Development Plan document, which we understand will occur following adoption of the revised Local Plan.

Whilst Olympian Homes are supportive of many of the draft policies within the Proposed Submission Version of the Revised Lambeth Local Plan, the policy relating to the development of large-scale purpose-built shared living in its current draft form is not considered to be sound and does not allow sufficient flexibility to avoid undermining a viable delivery of key strategic sites.

A detailed breakdown of our representations on the relevant policy, set out per the questions and format of Part B of LB Lambeth's Pre-Submission Publication Representation Form, is set out below. Our completed Part A of the submission form is appended to this letter and also attached separately.

PART B OF LB LAMBETH'S' PRE-SUBMISSION PUBLICATION REPRESENTATION FORM

Part B Question	Consultation Response
3. To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate	Policy H13 (Large-scale purpose-built shared living) – Parts A and B
4. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is: <ul style="list-style-type: none"> • 4.1 Legally compliant • 4.2 Sound • 4.3 Complies with the Duty to co-operate 	<ul style="list-style-type: none"> • 4.1 – Yes • 4.2 – No • 4.3 – Yes
5. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is unsound because it is not: <ul style="list-style-type: none"> • 5.1 Positively prepared • 5.2 Justified • 5.3 Effective • 5.4 Consistent with national policy 	It is considered that Parts A and B of Policy H13 are unsound as it is not: <ul style="list-style-type: none"> • Positively prepared • Justified • Effective • Consistent with national policy
6. Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is not legally compliant or is unsound or fails to comply with the duty to co-	<u>Part A – i)</u> This part of the policy requires the provision of 15sqm of functional living space separate from the communal facilities for large scale purpose-built shared living (PBSL) accommodation.

<p>operate. Please be as precise as possible</p>	<p>There is no justification or evidence provided as to why 15sqm is the required limit to provide an adequate living environment for the health and well-being of people in the borough, and it is therefore this part of the policy is not justified and thus contrary to Paragraph 35 of the NPPF.</p> <p><u>Part A – ii)</u></p> <p>ii) of Part A requires PBSL to meet the minimum requirements for communal space for houses in multiple occupation (HMOs).</p> <p>Firstly, it is important to note that comparisons to HMOs are not justified on that basis that HMOs and PBSL are two distinct residential products that provide different communal and sharing facilities as part of their products.</p> <p>Further to this, the fact that the draft plan contains separate policies for HMOs and PBSL demonstrates they are indeed distinct products and therefore should be managed separately by policy. On that basis comparisons between the two, with comparable requirements are unjustified.</p> <p>Furthermore, the minimum requirements for houses in multiple occupation are not defined within the draft Plan (H9), or within the submitted evidence base. Again, this lack of evidence means to policy is not considered to be justified, and therefore does not meet the requirements of Paragraph 35 of the NPPF.</p> <p><u>Part A – iii)</u></p> <p>iii) of Part A places a rent cap on proposed at a rate no higher than the mean rental level for a studio in the private rented sector in that postcode area.</p> <p>It is considered a rent cap on the entire PBSL accommodation, on top of providing a 50 per cent discount to market value of 35 per cent of the units is unacceptable as required by Part C of H13.</p> <p>It is considered this requirement will render most PBSL proposals unviable.</p> <p>Consequently, this part of the policy is makes the policy undeliverable is therefore is neither effective (and thus contrary to Paragraph 35 of the NPPF) or positively prepared (and thus contrary to Paragraphs 16 and 35 of the NPPF)</p> <p><u>Part B – i)</u></p> <p>This part of Policy H13 states that PBSL would be unacceptable if a proposal results in a loss of existing self-contained residential</p>
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uses. Paragraph 5.125 of the sub-text to the policy states that when considering if a PBSL proposal on a site would result in the loss of self-contained residential uses the following would be considered:

- *whether a site has been allocated for housing*
- *whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing*
- *whether a site has an extant or historic planning permission for C3 housing*

It is considered this approach fails to pay any regard to the viability of self-contained residential uses on a site, particularly when the site has an extant or historic permission. The likelihood for any extant or historic permission not being implemented or delivered is most likely due to the residential use proving to not be viable in the particular area (due to construction costs rising and residential values plateauing). Consequently, in accordance with Paragraph 35 of the NPPF it is considered Part B – i) is not justified as it fails to consider alternative viable uses for a site. Furthermore, it is not effective on the basis that protecting a historic / extant unviable residential permission is not deliverable over the plan period. For the avoidance of doubt, 'deliverable' is defined in the NPPF (2019) as (our emphasis):

'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

The NPPF also clarifies when a site is 'developable', with the definition stating (our emphasis):

'To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'

Furthermore, Paragraph 120 of the NPPF states planning policies need to reflect changes in the demand for land and that where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs.

Paragraph 16 of the NPPF states plans should be prepared positively in a way that is aspirational but deliverable. It is therefore considered that as Part B – i) of the policy restricts the use of sites to one that can be proved to be undeliverable it is also therefore not positively prepared.

It is considered that Part B – i) fails to take into consideration whether a historic / extant permission is deliverable or developable, as defined by the NPPF, due to its viability, as well as failing to consider changes in demand for land and consequently it is considered to not be consistent with National Policy. Specifically it is not compliant with paragraphs 16 and paragraph 120 of the NPPF, as well as in conflict with the definitions of deliverable and developable.

Part B) – ii) and Part B) – iii)

These parts of Policy H13 states that Large-scale purpose-built shared living (PBSL) would be unacceptable if a proposed on a site allocated for another use or which has an extant planning permission for self-contained residential accommodation.

For the same reasons set out above for Part B – i) it is considered that Part B ii) and iii) of policy H13 are unsound as they are not positively prepared, justified, effective or consistent with national policies as they both also fail to consider the viability of allocated uses or extant residential permissions on a site.

Consequently, these parts of the policy are protecting allocations and extant permissions which may not be deliverable / developable (as defined in the NPPF) due to viability reasons and are consequently are not consistent with Paragraphs 120 and 16 of the NPPF.

Part B) – iv)

This part of Policy H13 states that PBSL would be unacceptable if a proposal would result in an over-concentration of similar uses, including purpose-built student accommodation (PBSA), which may be detrimental to residential amenity or the balance and mix of uses in the area or place undue pressure on local infrastructure.

Firstly, the grouping of PBSL and PBSA within the policy as similar uses that could result in an over-concentration of each other is not justified with any evidence. Furthermore, by doing so completely fails to consider that these are two distinct uses with distinct characteristics as well as catering for two different demographics of residents. Consequently, they both have distinct needs, which the policy fails to objectively assess as required by Paragraph 35 of the NPPF in order to be positively prepared.

We do not contest that a PBSL proposal should be deemed unacceptable if it causes a detrimental impact on residential amenity or if it results in undue pressure on local infrastructure.

However it is considered that the use of an over-concentration test is neither justified nor consistent with national policy.

Over-concentration is defined in paragraph 5.126 of the subtext to the policy as *'two uses of this nature, including purpose-built student accommodation, will not be permitted on adjacent sites; and there should be no more than two such uses within any given 500m radius'* this is because of their *'very high-density characteristics'* that could *'result in particular local pressures on services and infrastructure'*.

The interpretation of the policy is therefore that the presence of two PBSL or PBSA uses within 500m of each other is unacceptable as this causes harmful pressure on local services and infrastructure however no proportionate evidence is provided to support why two uses within 500m of each other has an unacceptable impact. Consequently, as set out in paragraph 35 of the NPPF it is considered this is not justified. It is considered that the impact on local services can be assessed fully at an application stage through various technical reports, and managed sufficiently through conditions and S106 obligations / contributions, and therefore there is no justified reason for this to be ruled out without assessment as part of the policy.

Furthermore, this approach of assessing two uses within 500m of each other as unacceptable is an arbitrary approach which gives no consideration to the local context of the site. For example, in Vauxhall, whilst there may be two PBSA developments within 500m of each other, there is also a large amount of high density self-contained residential developments within the area meaning

	<p>there is still a mixed and balanced community. Furthermore, as one of the most accessible and sustainable locations within the Borough, the presence of two PBSL/PBSA developments within 500m of each other at Vauxhall does not mean there will be an unacceptable impact on local services and infrastructure.</p> <p>Notwithstanding the above, the Local Plan does not at any point define what a ‘mixed and balanced community’ is. The arbitrary distance of having the same use within 500m of each other does not automatically equate to over-concentration. As noted above it must be considered in the round taking in to consideration the local context and surrounding development.</p> <p>Furthermore, Paragraph 16 of the NPPF specifically states <i>‘Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.’</i> It is considered the use of over-concentration within the policy, and the two uses within each other 500m threshold is unambiguous and therefore not consistent with National policy.</p> <p>For the reasons set out above, we therefore consider Part B) – iv) is not positively prepared, justified or positively prepared and is therefore unsound.</p>
<p>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.</p>	<p>The NPPG (Paragraph 002 Reference ID: 10-002-20190509) clearly states that is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies. In order for policy HC13 to be both realistic, deliverable and sound it is considered the following changes are necessary.</p> <p><u>Part A – i)</u></p> <p>In order to Part A i) to be sound it should remove specific reference to 15sqm of living space unless it can be fully justified. Consequently, it is suggested the policy is reworded as followed:</p> <p style="padding-left: 40px;"><i>i) each private unit includes <u>adequate</u> at least 15m2 functional living space separate from the communal facilities;</i></p> <p>Subsequently, the subtext of the policy is therefore suggested to be reworded as follows:</p> <p style="padding-left: 40px;"><i>5.123. 15m2 is the minimum personal living space considered acceptable in a largescale purpose-built shared living development in Lambeth. A smaller area per person would not provide an adequate living environment for the health and well-being of people in the borough. Each PBSL personal room should include</i></p>

windows to provide natural daylight. Community space should meet the minimum standards expected of houses in multiple occupation.-Storage space should be provided in both private and communal areas.

Part A – ii)

For Part A to be sound it is considered reference to HMOs and minimum HMO requirements should be removed, and it is considered the requirements of Policy H16 of the draft New London Plan control the amount of communal space sufficiently and Part A ii) of policy H13 should therefore be removed:

~~ii) communal space meets the minimum requirements for houses in multiple occupation; and~~

Subsequently, the subtext of the policy is therefore suggested to be reworded as follows:

5.123. 15m2 is the minimum personal living space considered acceptable in a largescale purpose-built shared living development in Lambeth. A smaller area per person would not provide an adequate living environment for the health and well-being of people in the borough. Each PBSL personal room should include windows to provide natural daylight. ~~Community space should meet the minimum standards expected of houses in multiple occupation.-Storage space should be provided in both private and communal areas.~~

Part A – iii)

For Part A to be sound it is considered reference to the rent cap should also be removed to ensure deliverability schemes and iii) should therefore be removed:

~~iii) rents per room are set no higher than the mean rental level for a studio in the private rented sector in that postcode area (based on London Rent Map data).~~

Subsequently, it is considered the related subtext should also be removed:

~~5.124. To help ensure the accommodation is meeting local need, rather than attracting higher-earning tenants from outside the borough, rent levels per room should be no higher than those for a studio in the existing private rented sector in the borough, based on London Rent Map levels by postcode area. Comparator rent levels~~

should be not of household bills. This requirement will be secured through a s106 legal agreement.

Part B – i)

In order for Part B – i) to be sound it is considered it must reference the viability of providing self-contained residential accommodation. Consequently it is suggested the policy is reworded as followed:

i) it would result in the loss of existing self-contained residential accommodation (C3), unless this is demonstrated as unviable;

Paragraph 5.125 should also be amended to reference the viability of self-contained residential accommodation as follows:

5.125. Proposals for large-scale purpose-built shared living should not compromise delivery of self-contained housing to meet Lambeth’s London Plan housing target. When considering whether a proposal for large-scale purpose-built shared living would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to the following criteria and whether these can be delivered viably:

- whether a proposal would displace existing C3 residential accommodation*
- whether a site has been allocated for housing [within an up to date Development Plan]*
- whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing*
- whether a site has an extant ~~or historic~~ planning permission for C3 housing*

Part B – ii)

In order for Part B – ii) to be sound it is considered it must reference the viability of providing self-contained residential accommodation. Consequently it is suggested the policy is reworded as followed:

ii) it is proposed on a site allocated or protected for other uses, unless the allocated or protected use is demonstrated to be unviable;

Part B – iii)

In order for Part B – iii) to be sound it is considered it must reference the viability of providing self-contained residential

accommodation. Consequently it is suggested the policy is reworded as followed:

iii) it is proposed on a site with an extant planning permission for C3 housing, unless the extant planning permission is demonstrated to be unviable; and/or

Part B – iv)

In order for Part B – iv) to be sound it is considered it must remove reference to over-concentration and PBSA, and instead focus on the impacts of a proposal on residential amenity and local services and infrastructure on a site by site basis.

Consequently it is suggested the policy is reworded as followed:

iv) it would result in ~~an over-concentration of similar uses, including purpose-built student accommodation, which may be an unacceptable detrimental impact to residential amenity or the balance and mix of uses in the area or place undue pressure on local infrastructure.~~

Furthermore, paragraph 5.126 should also then be amended to reflect this, as follows:

5.126. ~~Several Schemes of this nature in close proximity, and/or in proximity with student housing schemes, could adversely affect the mix and balance of population in a neighbourhood or result in particular local pressures on services and infrastructure given their very high-density characteristics. The policy therefore would not support proposals which have been demonstrated to cause an unacceptable impact upon the amenity of nearby residential uses, or upon local services or infrastructure, with potential to result in an overconcentration of such uses in a neighbourhood. Over-concentration, including purpose-built student accommodation, This will be assessed on a case by case basis, having regard to the location of the site and local circumstances. Generally two uses of this nature, including purpose-built student accommodation, will not be permitted on adjacent sites; and there should be no more than two such uses within any given 500m radius.~~

For the avoidance of doubt, these representations on behalf of Olympian Homes consider the revised wording of Parts A and B of Policy H13 should be revised to the following:

a) Development proposals for large-scale purpose-built shared living will be supported in Waterloo and Vauxhall

only where they meet both the requirements of London Plan policy H16 and each private unit includes adequate functional living space separate from the communal facilities.

b) A development proposal for large-scale purpose-built shared living will not be permitted on public-sector land or where:

i) it would result in the loss of existing self-contained residential accommodation (C3), unless this is demonstrated as unviable;

ii) it is proposed on a site allocated or protected for other uses, unless the allocated or protected use is demonstrated to be unviable;

iii) it is proposed on a site with an extant planning permission for C3 housing, unless the extant planning permission is demonstrated to be unviable; and/or

iv) it would result in an unacceptable detrimental impact to residential amenity or place undue pressure on local infrastructure.

These representations consider paragraphs 5.123 to 5.126 should then be updated (and re-numbered) to the following wording:

5.123. Each PBSL personal room should include windows to provide natural daylight. Storage space should be provided in both private and communal areas.

5.124. Proposals for large-scale purpose-built shared living should not compromise delivery of self-contained housing to meet Lambeth's London Plan housing target.

When considering whether a proposal for large-scale purpose-built shared living would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to the following criteria and whether these can be delivered viably:

- whether a proposal would displace existing C3 residential accommodation [within an up to date Development Plan]*
- whether a site has been allocated for housing*
- whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing*
- whether a site has an extant ~~or~~ historic planning permission for C3 housing*

	<p><i>5.125. Schemes of this nature may result in particular local pressures on services and infrastructure given their very high-density characteristics. The policy therefore would not support proposals which have been demonstrated to cause an unacceptable impact upon the amenity of nearby residential uses, or upon local services or infrastructure. This will be assessed on a case by case basis, having regard to the location of the site and local circumstances.</i></p>
<p>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?</p>	<p>Yes</p>
<p>9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:</p>	<p>Purpose Built Shared-Living accommodation is a new residential product therefore it is considered that representations are required in person to ensure that our client's points, and the unique characteristics of PBSL, are fully explained to the Inspector.</p>

Points of Clarification

Policy PN2 - Vauxhall

As outlined above, Olympian Homes have an interest in a site located within the Vauxhall area and are extremely supportive of Policy PN2 and its support for the high-density mixed-use regeneration of the Vauxhall Area. Specifically they support the support for town-centre-led development at Vauxhall Cross, Miles Street and Pascal Place, enhancing connectivity between Vauxhall Cross, the riverside and Nine Elms/Battersea to the south.

Olympian Homes consider this policy to be legally compliant, sound and that it complies with the Duty to co-operate, however in Part a) of Policy PN2 Olympian consider the policy should explicitly support a range of residential products within Vauxhall to help build a balanced and sustainable community. Consequently, it is suggested Part a) is amended as follows;

a) Creating a sustainable mix of high density development and uses, both commercial and residential, contributing to the delivery of the remaining potential for a range of new homes and jobs, including construction jobs, in the Nine Elms Vauxhall area as a whole;

Site 11 - Keybridge House, 80 South Lambeth Road, 10-22 Wyvill Road (even) and 143-161 Wandsworth Road (odd) SW8 1RG

As set out above in these representations, the site Olympic Homes have interest in is located within the allocation for site 11 (Keybridge House, 80 South Lambeth Road, 10-22 Wyvill Road (even) and 143-161 Wandsworth Road (odd) SW8 1RG). Whilst Olympic Homes are not making reps against this site allocation through these representations on the Proposed Submission Version of the Revised Lambeth Local Plan, it is intended to make representations against it as part of the consultation on a revision Site Allocations Development Plan document, which we understand will occur following adoption of the revised Local Plan.

These representations will focus on the type of residential uses permitted in the allocation and its compliance with the definitions of deliverable and developable within the NPPF, as well as NPPF Paragraph 120 which states (our emphasis):

Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

Conclusion

Overall, the draft policy H13 of the Revised Draft Lambeth Local Plan requires amending in order to enable sites to be both developable and deliverable as defined by the NPPF, to ensure that a viable development can be brought forward as an alternative residential product that still meets a housing need.

The policy and its sub-text, in their current form would result in sites with extant and historic residential planning permissions lying un-developed with no prospect of an alternative residential product being accepted, that would bring forward the development of the site and provide wider regeneration benefits.

To summarise, Olympic Homes consider Policy H13 needs revising to ensure the unique viability of each site is fully considered when assessing a proposal for Large Scale Purpose-Built shared living proposals.

Yours sincerely,



Catriona Fraser
Director

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Appendix 1 – Pre-Submission Publication Representation Form - Part A

Pre-Submission Publication Representation Form



Name of the document (DPD) to which this representation relates:

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or by post: Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG
by 11pm on 13th March 2020.

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Part A

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2. Agent's details (if applicable)

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