

Pre-Submission Publication Representation Form



Ref:

R063

(for official use only)

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	<input type="text"/>	<input type="text"/>
First name	<input type="text"/>	<input type="text" value="Karen"/>
Last name	<input type="text"/>	<input type="text" value="Jones"/>
Job title [†]	<input type="text"/>	<input type="text"/>
Organisation [†]	<input type="text"/>	<input type="text" value="RPS"/>
Address	<input type="text"/>	<input type="text" value="20 Farringdon Street"/>
	<input type="text"/>	<input type="text" value="London"/>
	<input type="text"/>	<input type="text"/>
	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="EC4A 4AB"/>
Telephone	<input type="text"/>	<input type="text" value="0207 832 0259"/>
Email [†]	<input type="text"/>	<input type="text" value="k.jones@rpsgroup.com"/>

[†] where relevant

Pre-Submission Publication Representation Form

Part B – please use a separate sheet for each representation

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

Paragraph no. Policy no. Policies Map

4. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is:

(please tick)

4.1 Legally compliant

Yes

No

4.2 Sound[^]

Yes

No

4.3 Complies with the Duty to co-operate

Yes

No

[^] *The considerations in relation to being 'sound' are explained in the notes at the back of this form. If*

you have ticked 'No' to 4.2, please continue to Q5. Otherwise please go to Q6.

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:

(please tick)

5.1 Positively prepared

5.2 Justified

5.3 Effective

5.4 Consistent with national policy

(Please tick only one option. A separate form should be used if you wish to raise more than one concern.)

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-operate. Please be as precise as possible

If you wish to support the legal compliance or soundness of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 or their compliance with the duty to co-operate, please also use this box to set out your comments and then go to Q9.

Proposed Modification: In accordance with London Plan Policy E3, the council will apply the following requirements for affordable workspace in the following locations: i) In Waterloo/Southbank and Vauxhall developments proposing at least 1000sqm (GIA) gross B1a office floorspace should provide 10 per cent of that floorspace at 50 per cent of market rents for a period of 15 years, unless it can be demonstrated for site specific circumstances that a more appropriate product or end user can be provided to benefit the local business needs.

(if required continue on the additional comments page attached)

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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.

See detailed response within representation letter.

(if required continue on the additional comments page attached)

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:

To ensure the soundness and effectiveness of the draft Local Plan through the inclusion of amended wording to Policy ED2 and greater flexibility for the provision of affordable workspace.

(if required continue on the additional comments page attached)

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

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4.1 Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.2 Sound[^]	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.3 Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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(please tick)

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5.3 Effective	<input checked="" type="checkbox"/>
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With regard to KIBAs, there has been substantial changes to the wording of Draft Policy ED3 between the Regulation 18 (October 2018) and the current Regulation 19 (January 2020) stages, removing business as an acceptable use class. This approach is not legal or sound, as there has been no public consultation on the change or ability to comment on individual sites.

(if required continue on the additional comments page attached)

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It is recommended to amend the wording of Draft Policy ED3 part a) to the following 'Development in KIBAs will be permitted only for business, industrial, storage and waste management uses, including green industries and other compatible industrial and commercial uses (excluding large scale retail) ancillary to, or providing for, the needs of the KIBA.' This approach would return to the currently adopted planning policy position and the Regulation 18 stage of the emerging Local Plan, which allowed business uses in KIBAs.

It is also recommended that the Draft Policy ED3 should be based on specific sites and the Old Costa Roastery site on Old Paradise Street should be removed from the KIBA and re-designated as a general employment area.

(if required continue on the additional comments page attached)

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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:

To ensure the soundness and effectiveness of the draft Local Plan through the amendment of this policy and supporting text.

(if required continue on the additional comments page attached)

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.

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Draft Policy EN1 should be amended to enable flexibility to major developments. This should be on the basis that, owing to specific site constraints (i.e. a constrained industrial site), proposals may not be able to achieve all aspects of urban greening requirements set out in the London Plan policy.

(if required continue on the additional comments page attached)

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Proposed Modification: The wording of part f) should be amended as follows: 'For all developments, the Council will strongly encourage the inclusion of urban greening measures, as set out within London Plan policy G5, unless exceptional circumstances for specific sites can be demonstrated.'

(if required continue on the additional comments page attached)

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(if required continue on the additional comments page attached)

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The adoption of the Revised Lambeth Local Plan and Policies Map.

Signature

Date

Our ref: KJ/23920



Date: 13 March 2020

20 Farringdon Street
London, EC4A 4AB
T +44 20 3691 0500

Planning Policy Team
London Borough of Lambeth
PO Box 734
Winchester
SO23 5DG

Dear Sir / Madam

REGULATION 19 CONSULTATION ON THE DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020 REPRESENTATIONS ON BEHALF OF BYWATER PROPERTIES

Introduction

We act on behalf of our client, Bywater Properties, and are pleased to submit representations on the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020, which was published for consultation on 31st January 2020.

Bywater Properties are the applicant for a planning application (ref no. 19/04592/FUL) at 30-34 Old Paradise Street, that was submitted to the London Borough of Lambeth, as Local Planning Authority (LPA) in December 2019 and is currently under consideration. The planning application proposes the redevelopment of the former Costa Coffee Roastery for a new commercial building providing a mix of office (B1a) and light industrial (B1c) uses. Notwithstanding the current working relationship with the LPA regarding the current planning application, there are some key elements of the emerging planning policy that require specific comment. Our client welcomes the opportunity to influence the draft Local Plan and continue to work in partnership with the LPA.

In terms of an overall planning policy context, the National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing, employment and other development uses can be delivered. The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London, and states that boroughs' local development documents must be 'in general conformity' with it.

Given that the consultation process is at the Regulation 19 stage, this representation is confined to the legal compliance and soundness of the draft Plan, with reference to the NPPF and the adopted and draft London Plan. We set out our comments against the relevant thematic sections, overarching strategic and detailed policies, and indicate recommended modifications to ensure the Plan's soundness.

Draft London Plan (2019) – March 2020 Update

On the 13th March 2020, the Housing Secretary provided a formal letter to the Mayor of London on the need for an improved London Plan. In relation to industrial land, the Mayor has been directed to take a more proportionate stance to industrial land policies by removing the 'no net loss' requirement on existing

industrial land sites whilst ensuring that Boroughs bring new industrial land into the overall supply. It is anticipated that all Boroughs will need to respond accordingly to this dynamic policy position over the next days and weeks and we will review Lambeth's position and how this will affect its Local Plan review and progress.

Draft Policy ED1: Offices (B1a) (page 121)

The Draft Local Plan sets out an economic strategy in relation to the protection of existing workspace and the provision of different forms and types of employment floorspace including office and industrial uses.

This draft policy specifically outlines that proposals for large offices (greater than 1,000m² or more) will be supported in the Central Activities Zone (CAZ), Opportunity Areas and town centres. The policy goes on to state that outside of these areas, large office development will be supported where the scale of the proposal is appropriate to its location, the PTAL level is 4 or above and subject to the sequential test set out in section 7 (ensuring the vitality of town centres) of the NPPF. The policy also provides support for small offices and the criteria required to be met in the event of proposals involving the complete loss of office floorspace.

We are generally supportive of this policy to focus large office development on sites located in the CAZ, Opportunity Areas and town centres. This policy supports the land use position for offices located in the CAZ and Vauxhall and Waterloo Opportunity Area, in which the current planning application (ref no. 19/04592/FUL) at 30-34 Old Paradise Street is located.

Draft Policy ED2: Affordable workspace (page 125)

This draft policy sets out the approach to the provision of affordable workspace and, in accordance with Draft London Plan Policy E3, outlines that the Council will apply affordable workspace requirements within specific locations. The supporting text of Draft Policy ED2 (paragraph 6.15) states that whilst in the majority of cases affordable workspace will be provided as affordable B1a office space, it may also be appropriate to provide the affordable workspace as discounted B1c light industrial and/or B1b research and development space, where this is feasible in design terms. **This approach is supported and enables flexibility for the provision of affordable workspace.**

In relation to the proposed development in Old Paradise Street, the policy states that in Waterloo/Southbank and Vauxhall, developments proposing at least 1,000sqm (GIA) gross B1a office floorspace should provide 10 per cent of that floorspace at 50 per cent of market rents for a period of 15 years. It is noted that Draft London Plan Policy E3 policy sets out a framework for the provision of affordable workspace, and enables, in defined circumstances, planning obligations be used to secure affordable workspace at rents maintained below the market rate for specific social, cultural or economic development purposes. The London Plan Policy is not prescriptive in terms of thresholds, quantum of development and required affordable market rates. Unfortunately, this flexibility is not followed through within the Draft Lambeth Policy ED2.

The prescriptive nature of Draft Lambeth Policy ED2, in terms of the level of affordable workspace and the proposed length of agreement required in certain locations in the Borough, may not be viable for many developments. Viability will be a factor in relation to specifically constrained development sites, for example those that are physically constrained or that are poorly accessible which affect the redevelopment potential. Furthermore, the policy does not contain suitable flexibility if developers or landowners want to make alternative offers which can often be much more beneficial for end users.

To have a level of flexibility written within the policy, with the ability to negotiate on the level of affordable workspace where an exceptional case is relevant to the overall application, will ensure that schemes are viable to actually deliver. Furthermore, consideration must be given to sites located within KIBAs and the potential for reduced affordable workspace requirements, given the potential for specific site constraints and generally lower land values in the first instance.

Whilst Draft Lambeth Policy ED2, part f), enables the submission of viability information if the level of affordable workspace provided does not meet the policy requirement, a greater degree of flexibility should be included that supports the local needs of businesses. Paragraph 80 of the NPPF states that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*” It is considered much more important to provide new commercial floorspace that is fit for purpose and deliverable, taking local needs into account, rather than meeting an arbitrary policy requirement in terms of floorspace and reduced market rate as set out within the Draft Lambeth Policy. In order to align more with the aims and objectives set out within the NPPF and Draft London Plan, we consider a greater level of flexibility should be applied to this policy and the current wording should reflect more detailed consideration to specific sites and the local need in specific areas.

Proposed Modification: In accordance with London Plan Policy E3, the council will apply the following requirements for affordable workspace in the following locations: i) In Waterloo/Southbank and Vauxhall developments proposing at least 1000sqm (GIA) gross B1a office floorspace should provide 10 per cent of that floorspace at 50 per cent of market rents for a period of 15 years, unless it can be demonstrated that due to site specific circumstances a more appropriate product or end user can be provided to benefit local business needs.

Draft Policy ED3: Key Industrial and Business Areas (KIBAs) (page 132)

Draft Policy ED3 sets out that Key Industrial and Business Areas (KIBAs) are Lambeth’s ‘Locally Significant Industrial Sites’ as defined in the London Plan and represent the Borough’s strategic reservoir of land for business use. The Lambeth Local Plan Review document ‘Review of KIBAs’ outlines that KIBAs are a vital part of the local economy representing the Borough’s strategic supply of land for industrial, business and waste management use. The Old Paradise Street site is located within the Southbank House and Newport Street KIBA.

These sites are also a source of lower-cost premises for smaller and start-up businesses, including many in the creative, cultural and digital industries and other sectors such as food-making and distribution. There are 28 KIBAs designated in Lambeth, covering some 48 hectares of land in total, in a range of locations across the Borough. However, Lambeth does not contain any land that falls within the higher level London Plan classification of Strategic Industrial Locations (SIL).

With regard to KIBAs, there has been substantial changes to the wording of Draft Policy ED3 between the Regulation 18 (October 2018) and the current Regulation 19 (January 2020) stages. This approach is not legal or sound, as there has been no public consultation on the change or ability to comment on individual sites. The currently adopted Local Plan (October 2015) and, notably, the Regulation 18 stage of consultation set out that development in KIBAs will be permitted only for business, industrial, storage and waste management uses. However, the Regulation 19 stage has significantly changed the wording of the policy to state that development in KIBAs will be permitted only for industrial, storage and waste

management uses, and has removed the reference to business as an 'acceptable use'. This new planning policy position is a significant change from Regulation 18 to Regulation 19.

Furthermore, the supporting text of Draft Policy ED3 (paragraphs 6.29 and 6.30) provides further commentary on these acceptable uses in KIBAs and outlines that the level of industrial floorspace capacity lost in Lambeth in recent years means that any scope for intensification within KIBAs must be prioritised for industrial floorspace capacity, rather than to allow space for non-industrial uses. The supporting text states that proposals for additional B1a office floorspace in KIBAs will "not generally" be permitted.

This approach would align with the emerging London Plan position for dealing with existing industrial land. On this point, it is noted that Lambeth is placed in the 'Retain' category of Draft London Plan Policy E4. Within the supporting text to this policy (paragraph 6.4.7), Boroughs in the 'Retain' category should seek to intensify industrial floorspace capacity following the general principle of no net loss across designated SIL and LSIS, although Lambeth does not contain any SILs. This approach is also set out within Draft London Plan Policy E7(e).

Draft London Plan Policy E7(b) sets out that Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether industrial and logistical functions within SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure or to contribute to town centre renewal. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation, or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and **other uses** (*our emphasis*) may be considered and should also be part of a plan-led or masterplanning process.

Draft London Plan Policy sets out that **alternative uses may be considered appropriate within LSIS** (*our emphasis*) particularly residential and other uses, such as social infrastructure or to contribute to town centre renewal. As such, it is considered that as drafted, Draft Lambeth Policy ED3 which specifically precludes business uses within KIBAs, is not in conformity with the Draft London Plan. Furthermore, it does not consider the co-location of residential or other alternative uses as part of the wholesale development of an LSIS. The Draft Lambeth Policy ED3 is therefore not in conformity with Draft London Plan Policy E7 and greater flexibility should be provided in this regard.

Whilst it is acknowledged that as part of the Draft Local Plan, a review of KIBAs has been undertaken in the 'Review of Key Industrial Business Areas (December 2019)', further work should be undertaken to demonstrate why alternative business uses within KIBAs are not considered to be appropriate. With regards specifically to the Southbank House and Newport Street KIBA, over time the character and use of the overall KIBA has changed, given the key heritage considerations within the area, Old Paradise Gardens and the general sensitivity of the overall environment. Furthermore, there is a variety of different land uses within the area that are not industrial, including an art gallery. It is also noted that planning permission (ref no. 19/01304/FUL) has been recommended for a scheme at the 8 Albert Embankment site, the southern portion of the KIBA, for a mix of uses, including residential, retail and employment uses.

As such, the character and nature of this specific KIBA is changing and therefore consideration should be given to reverting to an overall flexibility of all B Class Uses within KIBAs, along with other acceptable uses

as set out within the Draft London Plan. Furthermore, it must be acknowledged that London's industrial landscape is changing and large industrial sheds outside of logistics, waste and storage are rarely required within inner London. Manufacturing is changing as consumers demand change and are seeking craft, bespoke and independent products made locally and in a much more sustainable way, with an identifiable provenance. The changing industrial landscape particularly in London needs to be considered and flexibility should be included within any forthcoming policy.

Consideration should also be given specifically to the type of uses that B1a offices and B1c light industrial actually comprise. The primary objective of the LPA, and this policy specifically, should be the creation of jobs, regardless of whether they sit within an arbitrary use class of B1a, B1b, B1c or a blurred area in between.

As such, an overall policy approach should provide flexibility for new development within KIBAs, to align with alternative acceptable uses as set out within the Draft London Plan, and effectively move back towards the currently adopted planning policy position for KIBAs and that contained within the Regulation 18 Draft Lambeth Plan. Alternatively, rather than a full review of the Southbank House and Newport Street KIBA, site specific consideration should be given to the Old Paradise Street site located within this KIBA. The Old Paradise Street Site itself is physically constrained by virtue of its location between Old Paradise Gardens, the railway line and adjacent neighbouring properties, whilst vehicle access and servicing routes are also restrictive. As such, it is not an appropriate location for a heavy industrial use sought by this emerging planning policy position and consideration should be given on a site by site basis rather than a blanket coverage across KIBAs.

The constraints of the site mean that any future development for industrial uses will be unlikely to be viable and will need to be cross subsidised by alternative uses (i.e. B1a offices). B1a floorspace in KIBAs is important and will provide the necessary cross subsidy to deliver high quality industrial product on lower floors and create a greater quantum of commercial space on the upper floors of new schemes, helping to ensure a bigger and stronger business community. A more flexible approach for acceptable uses should be taken specifically for the Old Paradise Street site, rather than the whole KIBA. Alternatively, the site should be removed from the KIBA and re-designated as an unallocated employment area.

Furthermore, the supporting text of Draft Policy ED3 refers specifically to the Southbank House and Newport Street KIBA, which falls within the Vauxhall Nine Elms Battersea London Plan Opportunity Area, and states that the KIBA policy takes priority over other policies in the plan. This is proposed to be entirely removed from the emerging Draft Policy ED3. Therefore, given that KIBA policy no longer takes priority, planning applications in this location should balance the weight of the requirements of both KIBAs and Opportunity Areas. Draft London Plan Policy SD1 sets out the Mayor's approach to Opportunity Areas in order to fully realise their growth and regeneration potential, seeking to encourage and deliver growth potential and support development which employment opportunities and housing choice for Londoners.

Given the above considerations, there are a number of options considered appropriate to provide an overall flexible approach to enable industrial areas to thrive, and to enable appropriate business (i.e. B1a office, B1b research and development, B1c light industrial) uses to be located within a KIBA. Our recommended modifications to Draft Policy ED3 are set out below.

It is recommended amending the wording of Draft Policy ED3 part a) to the following '**Development in KIBAs will be permitted only for business, industrial, storage and waste management uses,**

including green industries and other compatible industrial and commercial uses (excluding large scale retail) ancillary to, or providing for, the needs of the KIBA. This approach would return to the currently adopted planning policy position and the Regulation 18 stage of the emerging Local Plan, which allowed business uses in KIBAs.

It is also recommended that Draft Policy ED3 should be based on specific sites and the Old Costa Roastery site on Old Paradise Street should be removed from the KIBA and re-designated as general employment area.

Draft Policy EN1: Open space, green infrastructure and biodiversity (page 121)

The policy sets out the parameters as to how the Council will meet requirements for open space and green infrastructure. Specifically added to the policy is part f) which states that 'Applying London Plan policy G5 in relation to the urban greening factor for major developments. For other developments the council will strongly encourage inclusion of urban greening measures.'

Draft Policy EN1 should be amended to enable flexibility to major developments. This should be on the basis that, owing to specific site constraints (i.e. a constrained industrial site), proposals may not be able to achieve all aspects of urban greening requirements set out in the London Plan policy.

Proposed Modification: The wording of part f) should be amended as follows: ~~'Applying London Plan policy G5 in relation to the urban greening factor for major developments. For other developments the council will strongly encourage inclusion of urban greening measures.'~~ For all developments, the Council will strongly encourage the inclusion of urban greening measures, as set out within London Plan policy G5, unless exceptional circumstances for specific sites can be demonstrated.'

Draft Policy Q7: Urban design new development (page 269)

This policy outlines how new development schemes, including new buildings and conversions, will be supported, provided that a number of design criteria are met. Within the Regulation 19 Local Plan, Draft Policy Q7, an additional criterion has been added, which states **x) it does not prejudice the optimum future development of, or access to, adjoining plots.**

Whilst the general principle of this policy is understood and appreciated, the supporting text does not justify the reasons why this has been included into the Plan. The NPPF (paragraphs 117 and 118) sets out that planning policies should promote an effective use of land in meeting the need for homes and other uses. In order to align with these requirements, clarification should also be provided as to how the optimum future development will be assessed and used within the determination of planning applications.

Therefore, this policy should be retained in the draft Local Plan, but additional clarification should be provided.

Summary

We trust the above representation to the Regulation 19 Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 consultation will be fully taken into consideration by the Council and look forward to receiving confirmation that these representations have been received.

Our ref: KJ/23920



Should you have any queries or require any further information please do not hesitate to contact Karen Jones at this office.

Yours faithfully

A handwritten signature in dark ink, appearing to read 'Karen Jones'.

Karen Jones
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for RPS Consulting Services Ltd

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