

Tell us who you are

Ref: R068

Title

Mr

First name

James

Surname

Owens

Email address

james.owens@eu.jll.com

Agent's details

Are you an agent?

Yes

No

Title

Mr

First name

James

Last name

Owens

Job title (optional)

Director

Organisation

JLL

Address

30 Warwick Street, London

Postcode

W1B 5NH

Contact number

020 7087 5480

Email address (optional)

james.owens@eu.jll.com

Representors details

Title

Ms

First name

Rebecca

Last name

Crow

Organisation

Grainger plc

Your representation

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

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

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

Please state policy number

H2

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

Legally compliant

- Yes
- No

Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, is not legally compliant. Please be as precise as possible

The proposed submission version of draft Policy H2 deletes former Parts c) and d), so that there is no longer a requirement for the Council to take into account the individual circumstances of particular sites, including viability, nor for a financial appraisal to be provided where lower levels of affordable housing are proposed.

Therefore the replacement policy could not be said to be in general conformity with the London Plan, which has viability at its core with the threshold approach in Policy H5. Applicants either provide the minimum threshold, or go down a viability tested route to ascertain the maximum level of affordable housing that can be afforded.

With the more straight forward sites having already been developed, the vast majority of proposals involve the redevelopment of existing properties, which have established existing use values, that must be taken into account. If redevelopment and regeneration are to be encouraged, it is vital that the viability and other circumstances of each case, can be taken into account.

Sound

- Yes
- No

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

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

Please state why it is not consistent with national policy

The proposal in the submission draft of the Local Plan to delete the references to viability and other characteristics of a site being taken into account, are also inconsistent with national policy and therefore unsound.

In setting out the Government's policy on planning obligations (which would cover the provision of affordable housing, amongst other things) it specifically refers to viability in paragraph 57, stating that 'It is up to the applicant to demonstrate whether particular circumstances justify the need for viability assessments at the application stage.' The weight given to viability assessments is a matter for the decision maker, who must have regard to all

circumstances in the case (paragraph 57).

Furthermore, the NPPF states that when identifying a sufficient supply and mix of housing sites, a range of factors should be taken into account, including economic viability (paragraph 67).

Unless Policy H2 allows for viability and other characteristics to be taken into account, worthwhile regeneration and redevelopment proposals will not come forward and proposed Policy H2 will not be consistent with national policy.

Complies with the Duty to co-operate

Yes

No

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

(optional)

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

(optional)

Former Parts c) and d) of Policy H2 need to be reinstated.

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

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

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

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

Yes - I do wish to participate at the oral examination

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

Your representation 2

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

- Yes
- No

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

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

Please state policy number

Policy H5

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

Legally compliant

- Yes
- No

Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, is not legally compliant. Please be as precise as possible

Grainger Plc objects to Part i) which requires applicants to 'provide dual-aspect accommodation, unless exceptional circumstances are demonstrated'. This policy is not in general conformity with the London Plan and therefore fails the legal compliance test. The only way of providing major housing developments at the density required, with all units being dual aspect, would be by building towers, which are not always appropriate in existing urban areas and could conflict with the context and urban grain already evident in the area. London Plan Policy D6 states in Part C that housing development should maximise the provision of dual aspect dwellings and seek to restrict single aspect dwellings to those circumstances where it is considered necessary to achieve a more appropriate design solution and as part of aspirations to optimise site capacity. Lambeth does not provide any justification for going further and not conforming with the London Plan.

Sound

- Yes
- No

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

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

Please state why it is not consistent with national policy

As discussed above, the requirement in draft Policy H5 to provide dual aspect accommodation unless exceptional circumstances are demonstrated, could only be achieved through the development of towers in higher density urban developments.

As well as not conforming with the London Plan, this would not be consistent with the NPPF, which requires development to be sympathetic to the local character and surrounding built environment (paragraph 127(c)). As such towers would not always be appropriate.

Complies with the Duty to co-operate

Yes

No

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

(optional)

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

(optional)

In order to achieve compliance, draft Policy H5 a) i) should be replaced with the following wording: 'maximise the provision of dual aspect dwellings, with single aspect dwellings only being provided where it would provide a more appropriate design solution and help optimise site capacity, providing it can be demonstrated that it will have adequate ventilation, daylight, privacy and avoid overheating.'

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

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

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

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

Yes - I do wish to participate at the oral examination

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

Your representation 3

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

- Yes
- No

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

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

Please state policy number

Policy H11

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

Legally compliant

- Yes
- No

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

(optional)

Sound

- Yes
- No

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

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

Please state why it is not effective

The supporting text of the draft Local Plan explains in paragraph 5.100 that Policy H11 applies to schemes led by the Council and/or other Registered Providers. That is not something which is clear from the policy itself, despite being fundamental and therefore there needs a minor amendment in order to ensure that it is understood and interpreted accordingly.

Complies with the Duty to co-operate

- Yes
- No

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

(optional)

Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020

that you identified above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

The following sentence should be added at the start of Policy H11 to provide the clarification needed 'For applications led by the Council and/or other Registered Providers, the following criteria apply:'

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

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

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

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

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

Your representation 4

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

- Yes
- No

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

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

Please state policy number

Policy H12

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

Legally compliant

- Yes
- No

Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, is not legally compliant. Please be as precise as possible

The fact that Lambeth Council is recognising Build to Rent within its policies for the first time is welcomed. However, although the first sentence of the draft policy suggests that the Council will support Build to Rent developments and will follow the policy approach as set out in London Plan Policy H11, the subsequent additional requirements in Lambeth's draft policy take an entirely different and restrictive approach. As a result, Lambeth's draft policy cannot be said to be in general conformity with the London Plan, as required. The areas of concern in the draft policy are summarised in turn below:-

1. Requirement to manage the low cost rented housing independently by a Registered Provider – this additional requirement being suggested by Part a) of the draft policy applies to all but the smallest build to rent schemes (by being imposed on any build to rent development with more than one core). This directly conflicts with London Plan Policy H11, Part B 5), which states that Build to Rent schemes must have a 'unified ownership and unified management'.
2. 70% of the affordable housing to be low cost rented – in order to follow the Fast Track Route, there is an additional requirement within Part a) of the draft Planning Policy for 70% of the affordable housing to be low cost rented accommodation, with only 30% at discounted market rent in line with London Living Rent levels. This additional requirement being suggested in Lambeth's draft policy H2 conflicts with London Plan Policy H11 on Build to Rent. The starting point is clearly set out in London Plan paragraph 4.11.4, which states "The Mayor's strong preference is for DMR homes to be let at London Living Rent level.

In order to follow the Fast Track Route, the London Plan requires at least 30% of the DMR homes to be provided at an equivalent rent to London Living Rent, with the remaining 70% at a range of genuinely affordable rents (Part C of London Plan Policy H11). This flexibility for the 70% is intended to allow for a range of discounts up to the 80% of market rent defined in the NPPF, subject to income thresholds. The London Plan is clear that the discounted market rents with Build to Rent should be at intermediate levels. The approach of Lambeth is not in general conformity with this, as instead it seeks to impose a requirement where the 70% is at even lower rents below London Living Rents. **The draft policy explains that this is 'to meet priority housing need in Lambeth'.** However, this priority need should be met by other forms of affordable housing that are delivered as part of other non-Build to Rent housing schemes. What Lambeth fails to recognise is that the discounted market rent (DMR) to be delivered with Build to Rent proposals, is intended to meet the needs of the large number of households in London who are not in priority need, but who struggle to afford market rents.

Lambeth's alternative approach not only results in this intermediate housing need not being addressed fully, but also will undermine the viability of Build to Rent developments overall, to such an extent that it risks them not coming forward at all. The London Plan recognises the distinct economics of Build to Rent and states in paragraph 4.11.2 that 'Build to Rent may not be able to compete for land on an equal footing with speculative build for sale schemes, as it may generate lower initial land values'. The intermediate rents help to make Build to Rent schemes more viable and encourages this form of development to come forward and thereby contribute to increasing overall levels of housing development in line with the NPPF.

The Council has not provided anything like sufficient justification for not conforming with the London Plan.

3. The covenant period for Build to Rent schemes – Part d) of Draft Policy H12 adds an additional requirement for all Build to Rent schemes to be the subject of a covenant period for 25 years. This is not in general conformity with the London Plan. The London Plan Policy H12 advocates a covenant period of 15 years. Whilst footnote 66 in the London Plan does flag up covenant periods are expected to increase as the market matures, the Build to Rent market is in its infancy and this is the period defined for the next London Plan period, which is only just starting and there is no justification for Lambeth seeking such a substantially longer covenant period.

Sound

- Yes
- No

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

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

Please state why it is not consistent with national policy

In addition to draft Policy H12 not being in legal compliance, as it is not in general conformity with the London Plan, it is also not sound due to being inconsistent with National Policy.

Following the same approach, the areas of conflict are listed below:

i) Requirement to manage the low cost rented housing independently by a Registered Provider – Whilst the NPPF does usually seek the landlord for affordable housing for rent to be a Registered Provider, Annex 2 to the NPPF explicitly states that the exception is where it is included as part of a Build to Rent scheme 'in which case the landlord need not be a Registered Provider'. There is no justification for Lambeth to impose this additional requirement. The Government's Planning Practice Guidance expands upon Government policy by stating that both the affordable rent and private market rent within a Build to Rent development 'should be managed collectively by a single Build to Rent landlord' (ref: Paragraph: 002 Reference ID: 60-002-20180913).

ii) 70% of the affordable housing to be low cost rented – paragraph 61 of the NPPF requires differing types and tenure of housing need for different groups to be assessed and reflected in planning policies. People who rent their homes are specifically specified as once such group whose needs should be met. It is clear that the requirement also covers all forms of affordable need, not just those who have a priority housing need.

Annex 2 to the NPPF defines affordable housing for rent as being at least 20% below local market rents. It goes on to state that for Build to Rent schemes, affordable housing for rent is expected to be the normal form of affordable housing provision. The Government's Planning Practice Guidance confirms that Build to Rent is a distinct asset class and that where there is a need, planning policy should both promote and accommodate Build to Rent (ref: Paragraph: 001 Reference ID: 60-001-20180913). It goes on to restate the requirement for a minimum discount of 20% relative to local market rents for the affordable provision (ref: Paragraph: 002 Reference ID: 60-002-20180913).

Lambeth's draft policy to require 70% of the affordable as low cost rented accommodation, would be unviable for Build to Rent schemes to support.

The draft policy therefore goes well beyond the rent discount required by the NPPF, fails to recognise Build to Rent as a distinct asset class whose economics should be taken into account and would undermine the overriding Government's objective of significantly boosting the supply of homes as stated in paragraph 59.

iii) The covenant period for Build to Rent schemes – having a much longer covenant period of 25 years, would also put at risk the contribution Build to Rent could make in supporting the Government's objective of significantly boosting the supply of homes (paragraph 59 in the NPPF).

The Government's Planning Policy Guidance recognises that circumstances may arise where developers need to sell all or part of the Build to Rent scheme into owner occupation. It does on to state that consideration should be given to a covenant period, but states that 'Planning Authorities should recognise that Build to Rent operators will want sufficient flexibility to respond to changing market conditions' and that 'onerous exit clauses may impede development' (ref: Paragraph: 007 Reference ID: 60-007-20180913). Therefore whilst the affordable element should remain in perpetuity, the suggested covenant period of 25 years goes well beyond the 15 years that has been found to be sufficient in the London Plan, and would not enable it to be able to respond to changing market conditions, contrary to Government guidance. No evidence is put forward to justify this longer covenant period and it is therefore unsound.

Complies with the Duty to co-operate

- Yes
- No

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

(optional)

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

(optional)

Deletion of the words from draft Policy H12: 'subject to the following additional requirements' and the removal of the requirements a)-d) inclusive. The reference to London Plan Policy H13 in the first sentence should also be corrected to Policy H11.

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

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

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

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

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.

Please outline why you would like to participate at the oral examination

Grainger plc is the UK's largest listed residential landlord, whose business model is to develop, own and operate rental homes for the long term. It has over 160 years' experience as a professional landlord with over 9,000 homes across the UK. It is a market leader in the UK in the build to rent and private rented sector.

As part of its holding, Grainger owns a number of homes within the Borough of Lambeth, some of which are, or will be, in need of estate renewal. In addition, it also is bringing forward plans to provide new Build to Rent homes on surplus TfL land, as part of a joint venture with them.

Grainger is therefore uniquely placed to take part in discussions on Lambeth's draft Build to Rent policy.

With Build to Rent set to play an increasingly important role in helping to meet future housing needs, the serious flaws in the draft policy should be of significant concern and explored in the examination.

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.

Your representation 5

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

- Yes
- No

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

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

Please state policy number

T3

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

Legally compliant

- Yes
- No

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

(optional)

Sound

- Yes
- No

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

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

Please state why it is not justified

The requirement in Part (f) for at least 25% of total cycle parking provision to be the most accessible type, such as Sheffield Stands, is unreasonably onerous and is unjustified with no proportionate evidence.

Whilst the provision of 5% of total parking provision for larger and adapted cycles is supported, the requirement for a quarter of the spaces to use Sheffield Stands would substantially increase the already very large areas that need to be given over to cycle parking provision, particularly in residential developments, where the large numbers sometimes require basements having to be dug. The cost would be prohibitive and would impose an additional financial burden on bringing forward residential development, that is unjustified. It therefore fails the test of soundness.

Complies with the Duty to co-operate

- Yes
- No

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

(optional)

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

(optional)

The first part of Part (f) should therefore be deleted, together with the second reference to Sheffield type stands. Therefore in Part (f) the following words should be removed 'In all developments at least 25% of the total cycle parking provision should be the most accessible type, such as 'Sheffield' stands, of which' and in the third sentence remove the words '20 spaces with standard Sheffield type stands and a further'.

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

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

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

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

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

Your representation 6

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

- Yes
- No

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

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

Please state policy number

EN3

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

Legally compliant

- Yes
- No

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

(optional)

Sound

- Yes
- No

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

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

Please state why it is not justified

The draft policy requires all developments to connect to, and where appropriate extend, existing decentralised heating networks, unless a feasibility assessment demonstrates that such connection is not reasonably possible.

This policy is already dated. With the decarbonisation of the National Grid and substantial efficiency improvements in air source heat pumps, many schemes coming forward at the moment can already out-perform what could be achieved through a decentralised heating network. Furthermore, it is not unreasonable to expect that new technologies will come forward during the plan period, which could come up with even more efficient solutions. What is important is that developments minimise CO2 emissions and the Local Plan should not specify specific technologies as a requirement, especially when they are already proving to be outdated. The Building Regulations and the London Plan already provide a sufficient framework.

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan

2020 that you identified above, please give details

(optional)

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

(optional)

The draft policy EN3 on decentralised energy should be deleted in its entirety.

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

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

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

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

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

Your representation 7

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

Yes

No

Require further notification

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

(optional)

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

Review your answers

Review your answers

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

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

Declaration

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

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

Now submit your form using the submit button below.