

Pre-Submission Publication Representation Form



Ref:

R078

(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	MR	MR
First name	PAUL	ALAN
Last name	THELWELL	HANNIFY
Job title [†]		PLANNING CONSULTANT
Organisation [†]	CADDICK DEVELOPMENTS	UNION4 PLANNING
Address		30 STAMFORD STREET
		SOUTH BANK
		LONDON
Postcode		SE1 9LQ
Telephone		0207 122 0094
Email [†]		alan.hannify@union4.co.uk

[†] 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.

PLEASE SEE OUR WRITTEN REPRESENTATIONS.

(if required continue on the additional comments page attached)

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Yes I do wish to participate at the oral examination

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WE WISH TO DISCUSS THIS POLICY IN THE CONTEXT OF HOUSING DELIVERY AND THE NEED FOR THIS TO BE

(if required continue on the additional comments page attached)

REFLECTED IN THE WIDER PLAN .

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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

Alan Hannify

Date

13-03-20.

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Yes

No

4.2 Sound^

Yes

No

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Yes

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

THE WORDING OF THIS POLICY IS OF IMPORTANCE TO OUR CLIENT AND SHOULD REFLECT NATIONAL AND LONDON PLAN POLICY.

(if required continue on the additional comments page attached)

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Signature

Alan Harniff

Date

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Yes

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THE WORDING OF THIS POLICY MAY HAVE IMPLICATIONS FOR OUR CLIENT

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Alan Flannify

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THIS POLICY IS OF CRITICAL IMPORTANCE TO OUR CLIENT.

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Alan Klarify

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

THE PROPOSED CHANGES TO THE POLICIES MAP ARE IMPORTANT TO OUR CLIENT

(if required continue on the additional comments page attached)

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Signature

Alan Klarify

Date

13-03-20.



UNION 4 PLANNING

Caddick Developments

WRITTEN REPRESENTATIONS

On Draft Revised Lambeth Local Plan
Proposed Submission Version

In respect of 61 Lilford Road, Camberwell

March 2020



UNION4
PLANNING

Document Control

Project: 61 Lilford Road, Camberwell

Client: Caddick Developments

Job Number: U0037

Author(s): Steven Fidgett and Alan Hannify

Date: March 2020

Revision: 03

30 Stamford Street | London | SE1 9LQ
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1.0 Introduction

- 1.1 These representations are submitted on behalf of Caddick Developments in respect of the current consultation on the Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020).
- 1.2 Caddick Developments submitted written representations in December 2018 during the previous consultation on the new Lambeth Local Plan. The representations were made with reference to the BizSpace site at 61 Lilford Road, Camberwell, London, SE5 9HR. Bizspace and Caddick are jointly promoting a mixed-use regeneration initiative through the redevelopment of existing outworn employment space to provide both an enhanced quantum and quality of modern employment space together with new shared living accommodation above. The proposals have been designed specifically to accord with local and London Plan requirements.
- 1.3 The BizSpace site at 61 Lilford Road is situated within the south-western area of Camberwell. It forms part of the Key Industrial and Business Area (KIBA) referred to as 'Camberwell Trading Estate and Adjoining Sites' in the adopted Lambeth Local Plan. The southern part of the site is occupied by a part two-storey building, which fronts onto Lilford Road. The building is known as Lilford Business Centre and provides offices and studio workspaces. To the rear of this building is a series of workshop units, which are in light industrial use. The existing buildings are tired and dated and require increasing investment to maintain in a reasonable condition.
- 1.4 On the existing site at 61 Lilford Road, there is currently a mixture of office (Class B1a), workshops (Class B1c), with three units occupied by religious groups (Class D1) within the site. We would consider that approximately 769 sqm of floorspace can be described as office space, with 1,820 sqm of floorspace in use as workshops and the remaining 413 sqm of floorspace used by religious institutions for administrative purposes and as meeting spaces. Our client has worked with BizSpace to prepare plans for a mixed-use redevelopment of the site to include 1,969 sqm of light industrial floorspace, with 1,389 sqm of office floorspace. The proposals would, therefore, provide for an overall increase of 149 sqm light industrial space and 356 sqm in employment floorspace on the site overall. This would provide an intensification of light industrial use in both quantum and, importantly in quality – with all of the space now meeting GLA standards.

Regulation 19 Consultation

- 1.5 Following approval by Lambeth Council, the Draft Revised Lambeth Local Plan Proposed Submission Version and associated Proposed Changes to the Policies Map is being published for six weeks prior to submission for independent examination in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.6 The scope for representations during the current Regulation 19 pre-submission consultation is limited to the legal compliance and soundness of the draft plan.

- 1.7 Paragraph 35 of the National Planning Policy Framework (NPPF) outlines that Plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.8 The NPPF sets out that the aforementioned tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area.
- 1.9 These representations also take account of the letter from the Secretary of State for Housing, Communities & Local Government to the Mayor of London on 13 March 2020, which exercises powers under section 337 of the Greater London Authority Act 1999 to direct that the Mayor of London cannot publish the London Plan until they have incorporated the Directions set out in Annex 1. We consider that this letter is of significant relevance to some of the policies contained in the Draft Revised Lambeth Local Plan Proposed Submission Version.
- 1.10 These representations set out that the Draft Revised Lambeth Local Plan Proposed Submission Version is not sound and fails to deliver policies that are positively prepared, justified, effective or consistent with national planning policy. The reasons for reaching these conclusions are set out in this submission.
- 1.11 It should be noted that engagement has been sought with the Policy Team at Lambeth Council in relation to the earlier representations and an accompanying pre-application submission. We would repeat that request for engagement to seek to resolve the concerns raised.

2.0 Lambeth Local Plan Proposed Submission Version

- 2.1 The Lambeth Local Plan Proposed Submission Version is intended to provide the Council with an up-to-date Local Plan for the area, which will guide the spatial development of the borough over the next 15 years.
- 2.2 A Local Plan must achieve sustainable development for the area it covers. As set out in national planning policy, sustainable development has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).
- 2.3 The three overarching objectives of sustainable development are as follows:
- **an economic objective** - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - **a social objective** - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
 - **an environmental objective** - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 2.4 We understand that the Lambeth Local Plan Proposed Submission Version is informed by an evidence base which includes the following:
- statistical data and borough-wide studies;
 - area based studies and masterplans;
 - engagement with service and infrastructure providers;
 - the baseline review for the sustainability appraisal.
- 2.5 For the purposes of these written representations, we have focused on the following policies in the Lambeth Local Plan Proposed Submission Version, as follows:
- Policy H1: Maximising housing growth;
 - Policy H13: Large-scale purpose-built shared living;

- Policy ED2: Affordable workspace;
 - Policy ED3: Key Industrial and Business Areas (KIBAs).
- 2.6 In addition, we have considered the Proposed Changes to the Policies Map, both with reference to the aforementioned policies and the evidence base documents.
- 2.7 These representations also take account of the letter from the Secretary of State for Housing, Communities & Local Government to the Mayor of London on 13 March 2020, which exercises powers under section 337 of the Greater London Authority Act 1999 to direct that the Mayor of London cannot publish the London Plan until they have incorporated the Directions set out in Annex 1. We consider that the Secretary of State's letter is relevant to some of the policies contained in the Lambeth Local Plan Proposed Submission Version.
- 2.8 Caddick Developments would like to participate in the Examination-in-Public for the new Local Plan and will be represented by Union4 Planning.

3.0 Maximising Housing Growth

- 3.1 Policy H1 of the Draft Revised Lambeth Local Plan Proposed Submission Version outlines that the Council *"will seek to maximise the supply of additional homes in the borough to meet and exceed the annual housing target for Lambeth as set out in the London Plan for the period Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29"*. Furthermore, Policy H1 states that the Council will work *"with relevant partners to optimise the potential for housing delivery on all suitable and available brownfield sites"*.
- 3.2 Notwithstanding the aforementioned pledges, we do not consider that this provides a sufficient commitment to maximising housing delivery that is carried through the rest of the Plan, particularly in terms of the need to actively consider co-location and land use intensification, which is relevant in terms of the Key Industrial and Business Areas (KIBAs). The need to optimise housing delivery should be reflected in policies which are effective and positively prepared. Examples include Policy H13 which includes restrictions on the location of shared living accommodation and Policy ED3, which fails to recognise the potential for co-location and intensification of KIBA sites.
- 3.3 The Intention to Publish version of the London Plan required at least 13,350 additional dwellings in Lambeth over a 10-year period, with an annual target of **at least** 1,335 net additional dwellings per annum. This was a capacity led exercise and these targets are derived from an assessment of housing sites within the borough, carried out as part of the London-wide Strategic Housing Land Availability Assessment (SHLAA 2017). The overall level of housing does not meet the identified need and hence every borough is required to do everything it can to maximise housing delivery.
- 3.4 This means taking a real and evidential look at every site feasible. The BizSpace site at 61 Lilford Road is an example of where the Council has failed to do so. This site is capable of providing a net increase in employment space and 252 units of shared living accommodation, which would add to the flexibility of supply identified under Policy H1 and in the housing trajectory. In this regard, the site at 61 Lilford Road not only provides the opportunity to facilitate an intensification in employment generation with a significant enhancement in the quality and efficiency of the employment floorspace, but it also has the potential to contribute new homes through shared living accommodation.
- 3.5 The letter from the Secretary of State for Housing, Communities & Local Government to the Mayor of London on 13 March 2020 states as follows:

"Following the Planning Inspectorate's investigation of your Plan, they only deem your Plan credible to deliver 52,000 homes a year. This is significantly below your own identified need of around 66,000 homes and well below what most commentators think is the real need of London."

- 3.6 Furthermore, the Secretary of State's letter to the Mayor of London refers to the need to optimise density:

"It is important that development is brought forward to maximise site capacity, in the spirit of and to compliment the surrounding area, not to its detriment. Sites cannot be looked at in isolation and Londoners need to be given the confidence that high density developments will be directed to the most appropriate sites; maximising density within this framework."

- 3.7 The letter from the Secretary of State is very clear in setting out that leaving thousands of homes a year needed but unplanned for will exacerbate the affordability challenges within and around the capital. It is, therefore, incumbent upon all local planning authorities, including Lambeth Council, to seek to maximise housing growth.

4.0 Shared Living

- 4.1 The concept of shared living is recognised in the Intention to Publish version of the London Plan, with Policy H16 setting out the criteria that large-scale purpose-built shared living developments are expected to meet. Paragraph 4.16.1 of the Intention to Publish version of the London Plan states that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs.
- 4.2 It is noted that the letter from the Secretary of State for Housing, Communities & Local Government to the Mayor of London on 13 March 2020 does not include proposed modifications to Policy H16 which refers to shared living.
- 4.3 There is an increasing demand for shared living accommodation across London and it is a form of accommodation which serves a specific role within the housing market. Demand from single occupiers places a strain on the existing housing stock throughout Lambeth and is evidenced in the high proportion of Houses in Multiple Occupation (HMOs) in the area surrounding our client's site at 61 Lilford Road. Many of these are typically in older conversions of former houses and are of a poor standard.
- 4.4 Shared living accommodation which is carefully considered in terms of its location and design has the potential to provide a new and enhanced quality of accommodation, which can create long-term and sustainable communities.
- 4.5 The Draft Revised Lambeth Local Plan Proposed Submission Version provides a specific policy for shared living, as set out below.

Proposed Wording of Policy

- 4.6 Policy H13 of the Draft Revised Lambeth Local Plan Proposed Submission Version refers to large-scale purpose-built shared living and states as follows:
- 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 the following additional Lambeth-specific requirements:*
 - i) each private unit includes at least 15m² functional living space separate from the communal facilities;*
 - ii) communal space meets the minimum requirements for houses in multiple occupation; and*
 - 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).*

- 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);*
 - ii) it is proposed on a site allocated or protected for other uses;*
 - iii) it is proposed on a site with an extant planning permission for C3 housing; and/or*
 - iv) it would result in an over-concentration of similar uses, including purpose-built student accommodation, which may be detrimental to residential amenity or the balance and mix of uses in the area or place undue pressure on local infrastructure.*
- c) *Affordable housing contributions should be made in accordance with London Plan policy H16 in the form of a single upfront payment to Lambeth based on 50 per cent discount to market value of 35 per cent of the units (or 50 per cent of the units where the London Plan threshold applies), to be secured through a section 106 legal agreement.*

Legal Compliance and Soundness

4.7 We would object to the proposed policy for the reasons set out in the summary below:

- The restrictive nature of the policy in terms of both the locations and the circumstances in which shared living would be supported which we consider is clearly not positively prepared;
- The proposed restriction on the appropriate rental level, which is not justified or reasonable in the context of the nature and quality of accommodation provided;
- The lack of clarity and inappropriate restriction where there is judged to be an over-concentration of student or 'similar uses';
- The duplication with the London Plan on the affordable housing contribution sought.

4.8 We are further concerned that the approach set out in the policy does not reflect the positive presumption of the NPPF and adds additional criteria that is not consistent with the London Plan, the effect of which is to frustrate the provision of new shared living accommodation. This is a novel form of housing that responds to the housing crisis facing London and the UK by offering an alternative to traditional market and social housing models. It is precisely the sort of housing innovation the Government are seeking to encourage and can benefit specific groups such as key workers and help meet the needs of a mobile labour force.

4.9 Having regard to the proposed wording of Policy H13 set out above, it appears that the intention of the policy is that any proposals for shared living accommodation should be directed to the areas

of Waterloo or Vauxhall. In our view, there is no basis to treat this differently in terms of the acceptability in different parts of the Borough than the support given in general terms across the Borough for Build-to-Rent in Policy H12.

- 4.10 The rationale for directing such proposals to Waterloo and Vauxhall is outlined in Paragraph 5.121 of the Draft Revised Lambeth Local Plan Proposed Submission Version. This paragraph states that proposals *"should be located in Waterloo and Vauxhall because these have been identified as locations in which this form of development can viably provide the affordable housing contribution required by policy across all types of site; and because they are also well-connected by public transport and well-served by local services"*.
- 4.11 We would submit that the wording of Policy H13 and specifically the reference to Waterloo and Vauxhall is not justified, as it does not appear to be based on sound or proportionate evidence. The suggestion that these are the only locations that can viably provide the affordable housing contribution required across all types of site does not appear to be underpinned by any evidence from the housing topic papers which form the evidence base for the new Local Plan.
- 4.12 Whilst we understand the broad rationale for preferring sites that are well-connected and well-served by local facilities, the restriction of shared living to specific locations on the perceived basis that they can viably provide the affordable housing contribution is a flawed means of applying the policy and is not justified based on proportionate evidence.
- 4.13 There are a number of variables that need to be considered as part of a viability appraisal to determine affordable housing contributions, not least the existing use value of a site. Whilst projected rental values might be higher in Waterloo and Vauxhall, there are other variables that would potentially impact on the viability of a shared living development in those locations. The restriction of shared living to such locations on the premise that it will facilitate an affordable housing contribution is not justified and does not accord with the principles of proper planning.
- 4.14 It is unclear why the Council would seek to direct all shared living accommodation to Waterloo and Vauxhall – two areas with some of the highest rental levels per m² in the borough. Indeed, the London Borough of Lambeth's consultation response on the Draft New London Plan, dated 2 March 2018, expressed concerns regarding shared living, referring to *"the rent levels typically charged in this type of development, which are no lower than and sometimes exceed rents for rooms in shared houses in the same area"*. Having expressed this view in March 2018, it is unclear as to why the Council would now seek to direct shared living accommodation to the parts of the borough with the highest rental levels. To this end, we are concerned that Policy H13 has not been positively prepared.

- 4.15 Indeed, this is at odds with the social objectives of the NPPF and London Plan which seek to ensure that access to good quality housing is provided throughout London. If shared living is provided in areas with lower average market rents, then it enhances that accessibility.
- 4.16 It is our contention that Policy H13 should not restrict the location of shared living accommodation to Waterloo and Vauxhall. Such an approach is overly restrictive and fails to recognise that this particular form of accommodation can play an important role in supporting key workers and those employed by local institutions, irrespective of their location.
- 4.17 As an example, there is a significant need for accommodation for staff working at King's College Hospital, which is located approximately 500 metres to the southeast of the BizSpace site at 61 Lilford Road. The hospital employs a significant number of medical and ancillary staff and a large proportion of these need to be able to stay close to the hospital in order to be on call and available at short notice. Those employed at the hospital include doctors, nurses, clinicians and researchers, as well as a range of support staff who rent rooms within the immediate area, thereby placing a strain on the local housing stock. Often these are placements for several months or years and require a degree of flexibility. The hospital is also a focus for related research and activity.
- 4.18 In such circumstances, shared living accommodation would recognise the needs and bespoke requirements of hospital and related medical and research staff and is underpinned by a thorough understanding of the local context and the demand for occupation from single occupiers.
- 4.19 Shared living accommodation can and should help to meet the need for this form of residential accommodation and not just in Waterloo and Vauxhall, neither of which would meet the hospital's locational criteria.
- 4.20 Shared living is a relatively new concept, which is primarily a response to the needs of a more dynamic population, sometimes younger professionals but also a wide range of other sectors, including health professionals, that require a good quality of accommodation and which benefit from the support services, sense of community and inclusion that shared living can provide. This is relevant to large parts of the borough and to the emerging changes in the rental market.
- 4.21 The need and demand for shared living accommodation is partly borne out of the difficulties which professionals experience in the rent and purchase of traditional housing. A significant proportion of Londoners can no longer afford to rent or buy within the traditional housing market. They are often forced to rely on limited housing choice and rent substandard accommodation.
- 4.22 Whilst we appreciate that Lambeth Council is currently meeting its housing delivery targets, there is significant pressure on London as a whole to increase housing delivery above the figures proposed in the Intention to Publish version of the London Plan, as reflected in the comments made by the Secretary of State in his letter of 13 March 2020.

- 4.23 It is recognised that pressure for housing and lack of supply is a major problem in London. Hence where there is the opportunity to provide additional housing in an acceptable manner, such opportunities should be taken. This is the thrust of the emerging London Plan policies. Policy H1 of the Intention to Publish version of the London Plan states that boroughs should "*optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions*".
- 4.24 There is also every reason to optimise the delivery of new specialist accommodation, particularly where it will help to address a specific need, as is the case here. We would respectfully submit that the provision of accommodation for residents of the borough is not simply about the quantitative output of housing delivery. Rather, the objective should be to ensure that the specific needs of different cohorts of people are met and that the qualitative standards of accommodation form part of the borough's approach to housing delivery.
- 4.25 Indeed, the need to provide for different cohorts of society was clearly set out in the Intention to Publish version of the London Plan, with specific policies relating to Build-to-Rent, supported and specialised accommodation, and specialist older persons' housing.
- 4.26 There appears to be no real evidential basis in planning terms to seek to impose price controls on the rental levels that can or should be charged. If this is pegged to the average for studio accommodation in the area, this masks a variety of market factors and clear differences in the nature of the existing housing stock and supply.
- 4.27 It is also inappropriate to restrict the provision of new shared living proposals where there may be a preponderance of either student accommodation, bedsit accommodation, or HMOs. It is not clear in what circumstances the Council would consider an over-concentration would occur or what planning issues would be raised. The nature of shared living accommodation is very different to the role of student housing and is aimed at working people who want or need to be in a specific area or location and benefit from the integrated nature of the services and facilities provided. The provision of modern shared living accommodation addresses the problem of sub-standard accommodation in HMO's and ageing conversions.
- 4.28 We would conclude that Policy H13 of the Draft Revised Lambeth Local Plan Proposed Submission Version is unsound, as we consider that it is not positively prepared, justified, effective, or consistent with national policy.

5.0 Affordable Workspace

- 5.1 Policy ED2 of the Draft Revised Lambeth Local Plan Proposed Submission Version refers to affordable workspace, which would be provided at discounts on market rents.
- 5.2 We are concerned regarding the potential implications this policy might have on businesses within the wider borough and how this might impact on the viability of commercial development for employment space.
- 5.3 It is not clear from the current wording of Policy ED2 whether the thresholds would be based on net additional floorspace or would also be applied to the redevelopment of existing space. If the policy applies to the redevelopment of existing employment space, this may prove inhibitive to existing business owners who are seeking to redevelop and upgrade their employment space.
- 5.4 We also consider that there is a lack of clarity with regard to the qualifying criteria for affordable workspace providers on the Council's approved list. We would advise that clarity is required in relation to how businesses will be assessed as prospective tenants of the affordable workspaces and whether they will retain unfettered access to those spaces, irrespective of their commercial performance.
- 5.5 We would conclude that the current wording of this policy means that is not positive prepared, justified or effective.

6.0 Key Industrial and Business Areas

6.1 The Intention to Publish version of the London Plan places Lambeth in the 'retain' category for managing industrial floorspace capacity. This means Lambeth should seek to intensify capacity following the principle of no net loss across designated Locally Significant Industrial Sites. The Key Industrial and Business Areas (KIBAs) are Lambeth's Locally Significant Industrial Sites.

6.2 We consider that the current wording of Policy ED3 and the associated changes to the Policies Map are insufficient to positively promote the intensification of employment capacity across KIBA sites. Notwithstanding this, the need to look at intensification of industrial land in tandem with co-location of residential uses has become increasingly apparent following the letter from the Secretary of State for Housing, Communities & Local Government to the Mayor of London on 13 March 2020, which states as follows:

"Planning clearly requires a judgement to be made about how to use land most efficiently, enabling sufficient provision for housing, employment and amenity. The Inspectors considered your industrial land policies to be unrealistic; taking an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand. I am directing you to take a more proportionate stance - removing the 'no net loss' requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply."

6.3 Having regard to the above comment from the Secretary of State, it should be noted that our client has prepared an advanced design for the prospective redevelopment of the BizSpace site at 61 Lilford Road, which would incorporate an overall net increase in employment floorspace by 356 sqm, as well as facilitating a significant uplift in employment numbers on the site. However, the current wording of the KIBA policy is restrictive on the principle of co-location and as such, it fails to positively consider how to optimise the efficient use of existing industrial land.

Proposed Wording of Policy

6.4 Policy ED3 of the Draft Revised Lambeth Local Plan Proposed Submission Version refers to the Key Industrial and Business Areas (KIBAs). The policy states as follows:

a) 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) other than where clause (c) below applies.

b) The intensification of industrial uses in Use Classes B1b, B1c, B2 and B8 and industrial sui generis uses is encouraged in KIBAs, in accordance with London Plan policy E7 section A. Development proposals of this type should have regard to operational

requirements (including servicing) and mitigate impacts on the transport network where necessary.

- c) Areas of KIBA land with potential for both intensification and co-location with residential and other uses (in accordance with London Plan policy E7 sections B and D) are shown on the Policies Map. To be eligible for the Fast Track Route, a 50 per cent affordable housing threshold will apply to proposals of this nature if there is a net loss of industrial floorspace capacity, in accordance with London Plan policy H6.*

Legal Compliance and Soundness

- 6.5 We would raise objection to the above policy in that it adopts an unduly restrictive approach to the issue of co-location of employment and residential uses such as shared living accommodation, that does not accord with the NPPF or Intention to Publish version of the London Plan, and is not positively prepared.
- 6.6 The Intention to Publish version of the London Plan requires boroughs to identify as many sites, including small sites, as possible via their Development Plan Documents and to maximise housing delivery through positive policies, allocations, small sites and windfalls.
- 6.7 Specifically, we do not consider the policy as currently drafted to be consistent with Policy GG2 of the Intention to Publish version of the London Plan as proposed, which seeks to intensify and optimise the use of land within the urban area for a variety of uses and which recognises the challenges facing London. Similarly Policy ED3 is not considered consistent with Policies GG4 and H1 on optimising housing delivery, Policy GG5 and the related Economy policies, which seek to improve the quantity and quality of employment space that addresses the challenges of climate change through more efficient, sustainable buildings and development patterns.
- 6.8 Similarly, we do not consider Policy ED3 to be compliant with the NPPF in respect of measures to optimise the use of brownfield and previously development land and the creation of a vibrant mixed-use economy.
- 6.9 We would further consider that the policy is inconsistent with Policy H1 of the Lambeth Local Plan Proposed Submission Version. This commits the Council to maximise the supply of additional homes in the borough to meet and exceed the annual housing target for Lambeth as set out in the Intention to Publish version of the London Plan, with Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29. It proposes a number of measures to do so and importantly underlines the fact that the requirement is a target and not a cap, given the very real problems London has in meeting the needs over the Plan period and maintaining its policy of minimising the release of Green Belt sites.
- 6.10 In broader terms, we welcome the recognition Policy ED3 provides for the intensification of KIBAs and for co-location with residential and other uses.

- 6.11 We fully acknowledge the protection which Policy ED3 provides for KIBA sites and in this context, we support the role of the KIBAs in maintaining and enhancing the stock of employment premises in the borough. However, whilst we understand the policy and appreciate the rationale, we also consider that the policy needs to facilitate co-location in appropriate circumstances where the intensification of employment provision within the KIBA would otherwise be unviable.
- 6.12 Policy E7 of the Intention to Publish version of the London Plan refers to industrial intensification and co-location. The policy is clear in stating that development plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of Significant Industrial Sites (SIL) could be intensified to provide additional industrial capacity.
- 6.13 Further to this, Policy ED7 states that intensification can also be used to facilitate the consolidation of an identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal.
- 6.14 We welcome the fact that Policy ED3 of the Draft Revised Lambeth Local Plan now provides for co-location with residential and other similar uses. We note that three KIBA sites are identified as being suitable for co-location. However, we are concerned that:
- there is a lack of a consistent or coherent methodology being used in the selection of these sites; and
 - The policy approach is restrictive and does not support co-location outside of the three locations identified but where it can similarly deliver benefits in employment and residential terms.
- 6.15 Lambeth Council prepared a 'Review of Key Industrial Business Areas' (KIBAs) in December 2019 as part of the evidence base for the Draft Revised Lambeth Local Plan. The document refers to the three KIBAs that are identified as having potential for industrial intensification associated with an element of co-location with residential development. The three KIBA sites are as follows:
- 1) Parcel 8 of the existing Montford Place – Beefeater/Oval Gasworks KIBA;
 - 2) The whole of the existing Waterworks Road KIBA;
 - 3) The whole of the proposed new Knolly's Yard KIBA.
- 6.16 We have considered each of the three aforementioned KIBA sites in further detail under Section 7.0 of this document with reference to the Proposed Changes to the Policies Map.
- 6.17 In summary, whilst we do not object to the principle of co-location on the aforementioned KIBA sites, we consider that the methodology used to select these sites and the exclusion of other similar sites is unsound.

- 6.18 We are concerned that the Council has not considered the principle of co-location sufficiently, and the benefits it can provide, not least in facilitating the intensification and employment generating capacity of the existing KIBAs.
- 6.19 We would submit that a more nuanced approach to land uses on KIBA sites would be consistent with Paragraph 80 of the National Planning Policy Framework (NPPF) which emphasises the importance of helping *"to create the conditions in which businesses can invest, expand and adapt"*.
- 6.20 Importantly, it should be recognised that other KIBAs could benefit from investment facilitated by the co-location of employment and other uses, to improve the quality, quantity and nature of business space available. It is particularly important where employment led redevelopment would be unlikely to be viable in isolation and/or where the existing space is of a poor quality.
- 6.21 The BizSpace site at 61 Lilford Road is occupied by a series of old and inefficient buildings that are increasingly out-dated and in need of redevelopment. The nature of the uses within and adjoining the site have a high B1 content and would not be prejudiced by the inclusion of shared living.
- 6.22 As a matter of principle, we would consider that the redevelopment of a site of this nature should be considered acceptable where it retains the same level of employment floorspace, whilst providing a more efficient layout and modern buildings that meet future needs. The underlying objective should be the intensification of employment generation within the site.
- 6.23 On page 25 of the KIBA Review document, the following is stated with regard to industrial intensification and co-location:
- "Industrial intensification and co-location with other uses such as residential (allowed for through a plan-led approach in Draft London Plan policy E7) is not a priority in Lambeth. Lambeth does not need to rely on KIBA land to meet and exceed its Draft London Plan housing target. KIBA land must be prioritised instead to achieve the Draft London Plan requirement to retain industrial floorspace capacity in the borough."*
- 6.24 We are concerned with the above statement and the suggestion that industrial intensification and co-location is not a priority in Lambeth. If this position is underpinning the Council's approach to the identification of KIBA sites for co-location, we would seriously question whether Policy ED3 is positively prepared. The above statement is contrary to the approach that the Secretary of State has emphasised in his letter to the Mayor of London on 13 March 2020.
- 6.25 The achievement of housing targets and the protection of industrial floorspace capacity are not mutually exclusive objectives. If proposals can retain and enhance the quantity and quality of employment space, then by definition it achieves the KIBA objective of retaining industrial floorspace. This also ignores the fact, set out within the Local Plan evidence base for the KIBAs, that the nature of some of the KIBAs is predominantly B1 space and uses, including significant office space, which does not form part of the industrial capacity this statement seeks to retain.

- Indeed, industrial capacity can be facilitated by redevelopment to move the balance of space towards more industrial capacity, within a range of B1/B2/B8 uses if that is what is really sought by the approach.
- 6.26 In the right circumstances, the co-location of residential or shared living accommodation can help to unlock the potential of a KIBA, or land parcel within a KIBA, to optimise its employment generation.
- 6.27 In the Council's KIBA Review Document, the 'Camberwell Trading Estate and Adjoining Sites' is discussed under Section 2.3 of the document. It is stated on page 43 that *"there may be scope for some industrial intensification within the KIBA boundary, particularly within parcels 1, 2 and 4"*.
- 6.28 We welcome the acknowledgement that there is scope for the intensification of this KIBA, particularly parcel 1 which is the BizSpace site. The current buildings on parcel 1 are tired and dated and require investment, in order to be maintained to a reasonable standard. The layout and configuration of the buildings makes it extremely difficult to maximise their efficiency, or to retrofit in a manner which would allow them to better suit the needs of businesses which would support an uplift in employment numbers.
- 6.29 The existing buildings on the BizSpace site comprise an overall floorspace of 3,002 sqm and there are currently only 81 people employed on the site, with many of the units employing only 1 person. BizSpace would like to redevelop their existing site, but in order for this to be viable, it needs to form part of a mixed-use development. To this end, co-location is required on this site in order to facilitate the intensification of employment numbers.
- 6.30 The failure to recognise that co-location is required to unlock the potential for intensification on certain KIBA sites makes it extremely difficult to achieve the broader objectives in the new Local Plan. The 'Lambeth Investment and Opportunity Strategy' (June 2015) forms part of the evidence base and confirmed the Council's commitment to employment and housing growth in the borough. The Strategy states that the Council *"will take a proactive approach to encouraging and shaping development in Lambeth"*. The first priority of the Strategy is to *"accelerate and shape growth to benefit local people"*, with a stated ambition to deliver more than 25,000 new jobs.
- 6.31 The opportunity to facilitate the intensification of suitable parcels within KIBA sites should be identified as part of the Local Plan process, in order to meet the growth objectives which are outlined in the evidence base documents.
- 6.32 Shared living accommodation can complement employment floorspace when considered as part of a comprehensive mixed-use approach. In particular, there is a synergy between light industrial uses, flexible office floorspace and shared living, which allows for the shared use of outdoor spaces and the public realm throughout different times of the day.

- 6.33 The co-location of residential or shared living accommodation can, in the appropriate circumstances, provide for a more dynamic use of land. Moreover, this approach helps to make efficient use of urban land. This is consistent with Paragraph 127 of the NPPF which emphasises that planning decisions *"should support development that makes efficient use of land, taking into account the identified need for different types of housing and other forms of development"*.
- 6.34 Caddick Developments and BizSpace commissioned Child Graddon Lewis to consider the prospective redevelopment of 61 Lilford Road as part of an overall masterplan approach for the wider KIBA. This was a process which has informed our proposals for the new Lambeth Local Plan to identify intensification and co-location on parcel 1 of the 'Camberwell Trading Estate and Adjoining Sites KIBA'. The process considered the uses and physical characteristics of the wider KIBA and provided an understanding of how co-location on the BizSpace site would sit within the wider industrial context of the KIBA.

7.0 Proposed Changes to the Policies Map

7.1 As noted in Section 6.0 above, Policy ED3 of the Draft Revised Lambeth Local Plan Proposed Submission Version identifies areas of KIBA land with potential for both intensification and co-location with residential and other uses. These areas are identified as part of the Proposed Changes to the Policies Map.

7.2 The three KIBA sites which are identified as being suitable for co-location with residential development are as follows:

- 1) Parcel 8 of the Montford Place – Beefeater/Oval Gasworks KIBA;
- 2) The whole of the existing Waterworks Road KIBA;
- 3) The whole of the proposed new Knolly’s Yard KIBA.

7.3 We wish to note that we have no objection to the principle of co-location on any of the three sites. However, we would question whether the methodology for identifying these sites for co-location is sound, whilst land parcels within other KIBAs have similar attributes and stronger justifications for co-location but have been excluded from the policy.

Parcel 8 of the Montford Place – Beefeater/Oval Gasworks KIBA

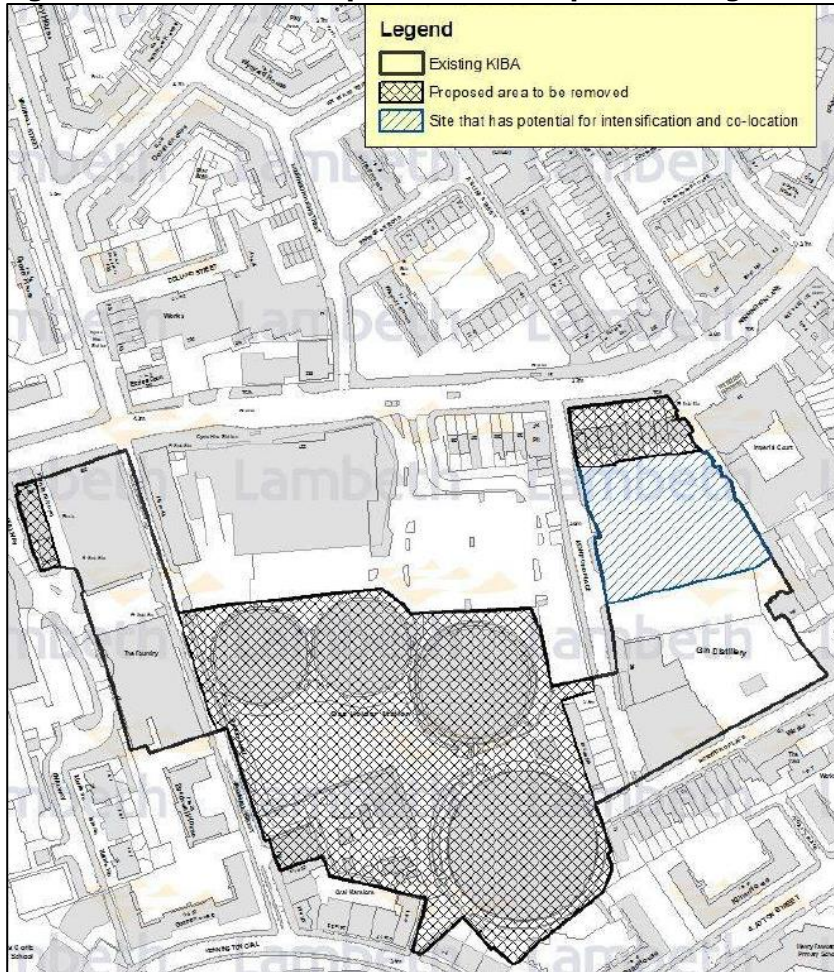
7.4 Map 2.16 illustrates the proposed changes to the Montford Place – Beefeater/Oval Gasworks KIBA, as shown in the map extract provided as Figure 1 overleaf. Parcel 8 is shown with hatched blue lines and is identified as being suitable for industrial intensification and co-location with residential and/or social infrastructure.

7.5 The Council’s KIBA Review document (December 2019) states that as a result of work undertaken alongside the GLA, Lambeth has identified parcel 8 of this KIBA as an area having potential for industrial intensification associated with an element of co-location with residential development.

7.6 It is stated in the KIBA Review document that this potential arises from the significant changes in the surrounding area already anticipated through the proposed redevelopment of the Oval Gasworks and associated proposed KIBA de-designation of that site; and the proposed de-designation of adjacent parcel 9. Figure 2 overleaf illustrates how parcel 8 sits in relation to the other land parcels within this KIBA.

7.7 It would, therefore, appear that the planning justification for identifying parcel 8 of this KIBA as being suitable for intensification and co-location is based on the changing context of the surrounding area and the emerging residential community in the vicinity of the KIBA.

Figure 1: Extract from Map 2.16 of the Proposed Changes to the Policies Map



Source: London Borough of Lambeth – Proposed Changes to Policies Map (January 2020)

Figure 2: Land Parcels within the Montford Place – Beefeater/Oval Gasworks KIBA

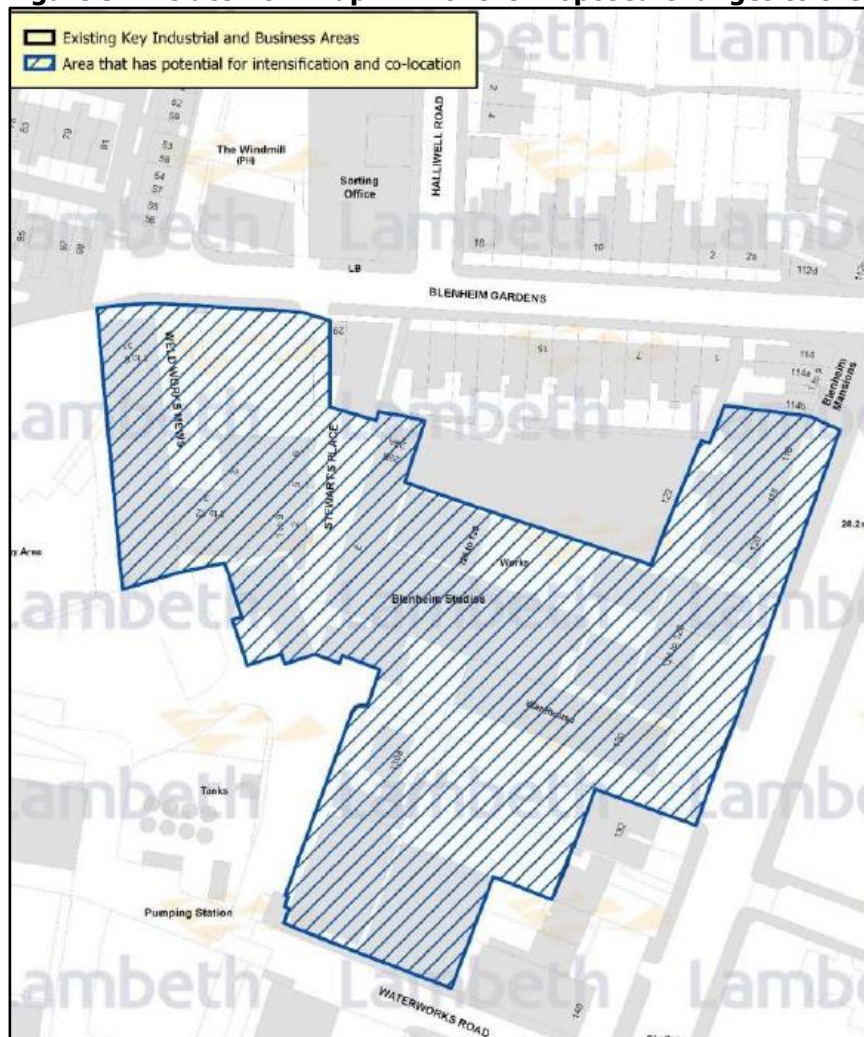


Source: London Borough of Lambeth – Review of Key Industrial and Business Areas (December 2019)

Waterworks Road KIBA

- 7.8 Map 2.17 illustrates the proposed changes to the Waterworks Road KIBA. The KIBA Review document (December 2019) recommended retaining the KIBA designation and identifying it as an area that has potential for industrial intensification and co-location.
- 7.9 The history of this KIBA as a 'mixed use employment area', combined with the impact of recent permitted development rights for change of use to residential has resulted in 19% of the floorspace in this KIBA being in B-class use. Over 60% of the land area of the KIBA includes residential uses within a mixed-use development.
- 7.10 The whole of the KIBA is identified as being suitable for co-location as illustrated by the blue hatched lines in Figure 3 below. Figure 4 overleaf illustrates the different land parcels within this KIBA.

Figure 3: Extract from Map 2.17 of the Proposed Changes to the Policies Map



Source: London Borough of Lambeth – Proposed Changes to Policies Map (January 2020)

Figure 4: Land Parcels within the Waterworks Road KIBA



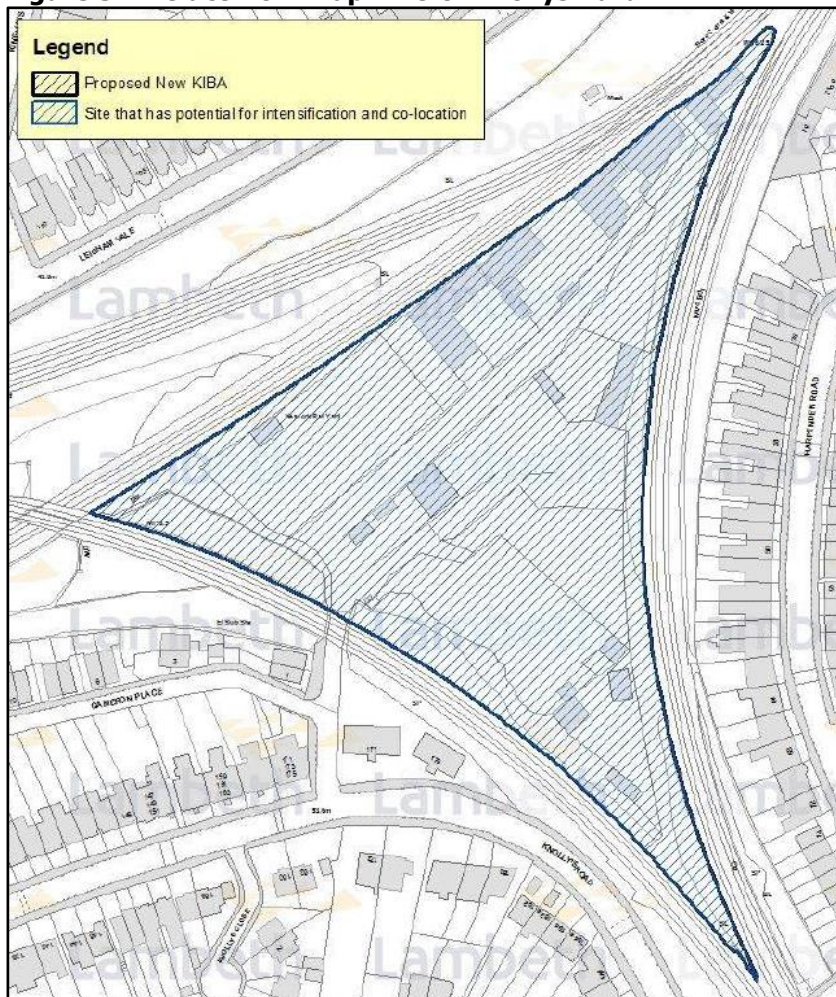
Source: London Borough of Lambeth – Review of Key Industrial and Business Areas (December 2019)

Knollys Yard KIBA

- 7.11 Map 2.18 illustrates Knollys Yard KIBA. Knollys Yard is owned by Network Rail and is designated as a new KIBA within the Draft Revised Lambeth Local Plan Proposed Submission Version.
- 7.12 Knollys Yard lies to the west of West Norwood and is surrounded by three mainline railway lines connecting London Victoria and Waterloo with the south coast. The surrounding area is largely residential in nature. West Norwood/Tulse Hill district centre is the closest town centre to the east.
- 7.13 According to the Council's KIBA Review document (December 2019), the site provides low cost industrial accommodation, including scaffolding and welding businesses, suitable for lower-value industrial uses and other industrial related businesses important to the local economy, particularly the construction sector. The KIBA Review document further states that the railway lines screen the industrial uses from neighbouring residential uses, thereby meaning that it is a suitable location for 'bad neighbour' uses that otherwise find it difficult to locate in inner London.

- 7.14 Knolly's Yard is identified as having the potential to be intensified to provide additional industrial capacity and/or co-location with residential and other uses, such as social infrastructure. The whole of the KIBA is identified as being suitable for co-location as illustrated by the blue hatched lines in Figure 5 below.
- 7.15 The KIBA Review document (December 2019) states that difficulties associated with delivering improvements to the access to Knollys Yard and the overall size of the site mean that it may be appropriate for a limited element of co-location with other uses.

Figure 5: Extract from Map 2.18 of Knollys Yard



Source: London Borough of Lambeth – Proposed Changes to Policies Map (January 2020)

Legal Compliance and Soundness

- 7.16 It is our contention that there is a lack of a consistent or coherent approach in the methodology for selecting KIBA sites for intensification and co-location. We would respectfully submit that the methodology and weighting applied to KIBA sites is unclear from the Council's KIBA Review document (December 2019) and the Draft Revised Lambeth Local Plan Proposed Submission Version.

- 7.17 Co-location within the Montford Place KIBA appears to be put forward on the basis that the surrounding urban context is undergoing change and will be increasingly residential in character. However, the same principle applies to a number of land parcels within KIBA sites in Lambeth. Indeed, parcel 1 of the 'Camberwell Trading Estate and Adjoining Sites KIBA' fronts onto Lilford Road, which is a road with a residential character located close to a series of residential streets, such as Paulet Road.
- 7.18 Co-location within the Waterworks Road KIBA appears to be considered acceptable on the basis that the KIBA already accommodates a predominance of residential and mixed-use developments with a low level of B-class uses. On this basis, it is a relatively poor performing KIBA. Whilst the introduction of further residential floorspace within the KIBA might facilitate the intensification of B-class uses, it is questionable as to whether this will retain the integrity of the KIBA. In contrast, the masterplan approach being promoted by Caddick Developments and BizSpace in respect of parcel 1 of the 'Camberwell Trading Estate and Adjoining Sites KIBA' would facilitate a net increase in B-class floorspace and a significant improvement in the quality of employment floorspace, whilst also safeguarding the integrity of the wider KIBA.
- 7.19 Co-location within the Knollys Yard KIBA appears to be considered acceptable on the basis of the existing access issues, and that the costs of improving the access could be made viable by co-location. This is a KIBA that currently accommodates heavy industrial uses that the Council's KIBA Review document describes as 'bad neighbour' uses. In such circumstances, it is questionable as to whether the co-location of residential and other uses within this KIBA would allow for such heavy industrial uses to be retained within this site. The KIBA Review document rightly acknowledges that such 'bad neighbour' uses find it difficult to locate in inner London. As such, we would question whether this particular KIBA site is best placed to accommodate co-location with residential development without compromising the existing heavy industrial uses that rely on it.
- 7.20 The BizSpace site at 61 Lilford Road is broadly comprised of a mixture of B1(a) office floorspace and B1(c) light industrial floorspace. The re-provision (and overall net increase) of this floorspace as part of a comprehensive mixed-use proposal represents a more appropriate form of intensification which would be made viable by co-location with a shared living component. This would provide a synergy of uses which makes efficient use of previously developed land and safeguards the integrity of the existing KIBA.
- 7.21 On this basis, we would submit that the identification of land parcels for intensification and co-location within KIBAs, as set out in the Proposed Changes to the Policies Map, is unsound. We consider that the Proposed Changes to the Policies Map are not positively prepared, justified or effective.

8.0 Climate Change

- 8.1 The Lambeth Local Plan Proposed Submission Version refers to the importance of tackling climate change, with the following strategic objectives set out on page 55 of the Plan:
- Improve air quality and reduce carbon emissions by minimising the need to travel and private car use, promoting sustainable travel and by maximising energy efficiency, decentralised energy, and renewable and low carbon energy generation in buildings and area regeneration schemes.
 - Safeguard and increase biodiversity through co-ordinated implementation of the Lambeth Biodiversity Action Plan.
 - Enable Lambeth to adapt to the effects of climate change, including drought, and flood risk and urban heat islands, through the location of development, mix of uses and design of the built environment, sustainable design and construction, retention of existing trees, significant levels of urban greening, and sustainable urban drainage, an integrated approach to water management and protection of the supply of water.
- 8.2 Further to the strategic objectives, Policy EN4 states that all development, including construction of the public realm, highways and other physical infrastructure, will be required to meet high standards of sustainable design and construction feasible, relating to the scale, nature and form of the proposal.
- 8.3 However, the objectives and policies relating to climate change do not follow through to the rest of the Plan. In particular, we would consider the restrictive nature of Policy ED3 means that it will not be viable for many business owners to upgrade or redevelop their existing employment stock where they are located on KIBA sites. In appropriate instances, co-location can enable the necessary redevelopment of out-dated employment premises that are inefficient and costly to heat.
- 8.4 By adopting a more nuanced approach to Policy ED3, the new Local Plan could not only facilitate the strengthening and intensification of certain KIBAs, but could also play a part in providing improved and energy efficient employment stock which helps to tackle climate change.

9.0 Summary and Conclusions

- 9.1 In summary, these representations are submitted on behalf of Caddick Developments in respect of the current consultation on the Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020).
- 9.2 Caddick Developments submitted written representations in December 2018 during the previous consultation on the new Lambeth Local Plan. The representations were made with reference to the BizSpace site at 61 Lilford Road which forms part of the 'Camberwell Trading Estate and Adjoining Sites KIBA'. Bizspace and Caddick are jointly promoting a mixed-use development at the site which seeks to provide both modern employment space and new shared living accommodation.
- 9.3 With regard to Policy H13 of the Draft Revised Lambeth Local Plan Proposed Submission Version, we consider that it should not restrict the location of shared living proposals to Waterloo and Vauxhall. We submit that the current wording of the policy is unsound on the basis that it is not positively prepared, justified or effective.
- 9.4 In broad terms, we welcome the updates made to Policy ED3 of the Draft Revised Lambeth Local Plan, namely the recognition it provides for the intensification of KIBAs and for co-location with residential and other uses. However, this policy needs to be informed by the identification of suitable KIBAs and land parcels within KIBAs, which are capable of providing for intensification and co-location. In other words, suitable sites need to be identified to ensure that this policy is effective. At this juncture, we consider that this is not the case.
- 9.5 With reference to the Proposed Changes to the Policies Map, we consider that the methodology and weighting applied to those KIBA sites identified for intensification and co-location is unclear from the Council's KIBA Review document (December 2019) and the Draft Revised Lambeth Local Plan Proposed Submission Version. We therefore consider that the Proposed Changes to the Policies Map are not positively prepared, justified or effective.
- 9.6 To conclude, we consider that careful consideration of modifications to proposed Policies ED3 and H13 of the Draft Revised Lambeth Local Plan Proposed Submission Version will help to facilitate a more joined-up approach in maximising the efficiency of KIBA sites, urban regeneration and the sustainable use of urban land. We wish to reiterate that we would like to participate in the Examination-in-Public for the new Local Plan.