

Pre-Submission Publication Representation Form



Ref:	R082	(for official use only)
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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)
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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.	
First name	Mohammed	Jonathan
Last name	Al - Miqdadi	Waugh
Job title [†]	Director	
Organisation [†]	Tucan Investments LTD	RPS
Address	137-143 Hammersmith Road	20 Farringdon Street
	London	London
Postcode	W14 0QL	EC4A 4AB
Telephone	0207 602 7055	0207 832 0280
Email [†]	almiqdadi@gmhsa.com	jonathan.waugh@rpsgroup.com

[†] where relevant

Pre-Submission Publication Representation Form

Part B – please use a separate sheet for each representation

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

Paragraph no. Policy no. Policies Map

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

(please tick)

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

[^] 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	<input type="checkbox"/>
5.2 Justified	<input type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input checked="" type="checkbox"/>

(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.

Draft London Plan Policy SD6 outlines that town centres should be strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses. Town centres are to be the primary locations for commercial activity beyond the Central Activities Zone. It is considered that in order to meet the objectives of this policy, and to be in compliance with the draft London Plan, the boundary of the Oval (Clapham Road) Local Centre should be amended to include 43-59 Clapham Road.

(if required continue on the additional comments page attached)

Pre-Submission Publication Representation Form

7. Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound, having regard to the test you have identified in Q5 above where this relates to soundness. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why this change will make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of this part of policy or text. Please be as precise as possible.

The boundary of the Oval (Clapham Road) Local Centre should be amended to include 43-59 Clapham Road, SW9 0JD

(if required continue on the additional comments page attached)

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

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

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

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

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

To ensure the soundness and effectiveness of the draft Local Plan through the inclusion of 43-59 Clapham Road in the Local Centre boundary.

(if required continue on the additional comments page attached)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

10. Please tick relevant boxes if you require notification of any of the following to your address stated in Part A:

That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination

The publication of the inspector's recommendations following the independent examination

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

Signature

Mohammed Al-Miqdadi - Tucan Investments LTD

Date

13 MARCH 2020

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

[^] 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	<input type="checkbox"/>
5.2 Justified	<input type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input checked="" type="checkbox"/>

(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.

The current wording of draft Policy ED14 (Hotels and other visitor accommodation) supports visitor accommodation in major and district town centres, but goes on to clarify that it is outside of town centres that additional accommodation will not be permitted. Therefore accommodation in local centres will be appropriate. Paragraph 6.101 again references major and district town centres, but the text should also clarify that visitor accommodation local centres will be appropriate.

This is to ensure compliance with Draft London Plan Policy E10, which, although not precluding non-town centre locations, promotes and encourages new serviced accommodation in town centres and well connected locations.

(if required continue on the additional comments page attached)

Pre-Submission Publication Representation Form

7. Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound, having regard to the test you have identified in Q5 above where this relates to soundness. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why this change will make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of this part of policy or text. Please be as precise as possible.

Therefore, draft Policy EF14 A should be amended to state:

ED14 A: 'Outside of the Waterloo CAZ boundary and Vauxhall Opportunity Area and CAZ boundaries visitor accommodation (C1) will be supported in major and district town centres. In these locations' visitor accommodation should be of an appropriate scale for the proposed location and should not unacceptably harm the balance and mix of uses in the area, including services for the local residential community.'

"6.101. In major, district and local town centres, when considering whether a proposal is of an appropriate scale, regard will had to the location of the site and local circumstances. 'Balance and mix of uses' will be assessed on a site by site basis having regard to the characteristics of an individual locality, including existing concentrations of visitor accommodation, and the nature and scale of the proposed development. Generally, two uses of this nature will not be permitted on adjacent sites. This assessment will take account of the visitor management plan provided and the potential to effectively mitigate negative impacts on the local area through planning obligations."

(if required continue on the additional comments page attached)

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

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

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

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

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

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

(if required continue on the additional comments page attached)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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

Mohammed Al-Miqdadi - Tucan Investments LTD

Date

13 MARCH 2020

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 Q5.

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.

The Draft London Plan sets out a requirement for a minimum of 12 months marketing. It is considered that Draft Lambeth Policy ED1 requiring two years is overly restrictive and is not in general conformity with the London Plan. Therefore this policy is not sound or effective.

(if required continue on the additional comments page attached)

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Therefore, the original wording of the policy should be retained and draft Policy ED1 part c) amended to state:

'Proposals involving a complete loss of office floorspace will not be permitted unless the following tests are met.
i. there is no demand for the office floorspace as demonstrated by evidence that the floorspace has been vacant and continuously marketed for a period of at least one year.'

(if required continue on the additional comments page attached)

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

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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:

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

(if required continue on the additional comments page attached)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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The publication of the inspector's recommendations following the independent examination

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

Signature

Mohammed Al-Miqdadi - Tucan Investments LTD

Date

13 MARCH 2020



LINCOLN HOUSE

137-143 Hammersmith Road, London, W14 0QL England
Telephone: +44 (0) 20 7602 7055 Fax: +44 (0) 20 7603 5533

DATE: 13 MARCH 2020

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

Dear Sir / Madam

**REGULATION 19 CONSULTATION ON THE DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED
SUBMISSION VERSION JANUARY 2020
REPRESENTATIONS ON BEHALF OF TUCAN INVESTMENTS LIMITED**

Tucan Investments Limited are pleased to submit representations on the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020, which was published for consultation on 31st January 2020.

Tucan Investments

Tucan Investments LTD ("Tucan") is a subsidiary of General Mediterranean Holding S.A.SPF ("GMH"), a strong and diverse business group with activities in Banking & Finance, Real Estate & Construction, Hotel & Leisure, Industrial, Trading & Pharmaceuticals and Communications & IT, with consolidated assets now exceeding £2 Billion. GMH group is currently working on two notable projects in Chicago and Egypt, The 78 and Marsa Alam development. The 78, is a 62 acres parcel of land located at the heart of Chicago with a planning permission to build 13.5 million sq. ft of mixed use with a gross development value of circa £5.5 Billion. The group is also developing a 2 million sq. m land in Marsa Alam, Red Sea - Egypt to build four hotels, retail and residential units.

Tucan specialises in asset management and land development and currently has a few ongoing projects. In addition to our project in Clapham-Lambeth, Tucan owns Haselmere industrial estate, which comprises a terrace of 8 warehouse units with a gross floor area of 111,084 sq. ft. In addition to this, Tucan owns a purpose-built warehouse and offices in Kings Lynn with a gross internal floor area of 73,057 sq. ft.

With regards to land development, Tucan is involved in the construction and development of Stonebridge Real Estate Development, a 6.7-acre site area located in easy walking distance from Stonebridge Park Station, in North West London. The development will have a gross development value of circa £500 Million and will include more than 900 residential units, retail and a 198-room hotel, allied to a new leisure and community complex.

REGISTERED IN ENGLAND No. 1990269



MEMBER OF THE GENERAL MEDITERRANEAN HOLDING GROUP

We own the existing vacant office building at 43-59 Clapham Road, SW9 0JD. Planning permission was granted at the site (ref no. 14/05187/FUL) in May 2016 for the change of use from vacant office (B1) to a hotel (C1) with extensions, infills and other associated works. We have recently submitted a request for pre-application advice (ref no. 20/00875/PREAPP) for the comprehensive redevelopment of the site for hotel use (C1).

The 2016 planning permission confirmed the acceptability of the principle of the loss of the office (B1a) floorspace on the site, as well as the acceptability of a hotel (C1) use in this location. It is a material consideration in the determination of future development proposals on the site. This scheme was also included in the net additional hotel room pipeline in the evidence base for the Draft Lambeth Plan, including 'Topic Paper 5: Visitor Accommodation' and 'Hotels and Other Visitor Accommodation in Lambeth 2018/2019'.

Draft Revised Local Plan, January 2020

Overall, Tucan Investments welcomes the Council's vision for Lambeth and the steps to support sustainable development across the Borough. These representations are informed by our experience as a developer, real estate and asset management, and the need to be in accordance with the draft London Plan, and represents our commitment to continue to work in partnership with the Council to deliver high quality development in the borough.

In terms of an overall planning policy context, the London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London, and states that boroughs' local development documents must be 'in general conformity' with the London Plan.

The London Plan was adopted in 2016; however, a New London Plan is at an advanced stage. In December 2019 the Mayor issued the Secretary of State his intention to publish the draft London Plan, which is due to be laid before the London Assembly in February 2020 with the potential for formal adoption in March 2020. It is understood that there have been delays in putting the Plan forward to the London Assembly and therefore these timescales are indicative and subject to being revised. Nevertheless, whilst the policies of the Draft London Plan have not yet been formally adopted, they do carry weight and are a material consideration.

Oval (Clapham Road) Local Centre Boundary

The draft Local Plan does not propose to make any changes to the boundary of the Oval (Clapham Road) Local Centre. 43-59 Clapham Road is located directly opposite the Local Centre and comprises several different uses, serving the local and wider area.

It is considered that the Local Centre boundary should be extended to include the 43-59 Clapham Road site. This is due to the historic commercial use of the site, that the site is currently in poor condition and has the potential for positive regeneration, and that the May 2016 planning permission confirmed that a hotel use is appropriate in this location.

Inclusion of the site would support this part of Clapham Road's role as a Local Centre and provides the opportunity to contribute to its multifunctional and diverse offering. This is considered to be in-line with Draft

Policy PN8 (Kennington/Oval) which seeks improvements to the quality of linkages with the local centre along Clapham Road, by improving the attractiveness of the public realm, the creation of appropriate public spaces and interesting features, and promoting active frontage uses along the route.

It is considered that the inclusion within the Local Centre is required for the Local Plan to be compliant with the Draft London Plan as draft Policy SD6 outlines that town centres should be strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses. Town centres are to be the primary locations for commercial activity beyond the Central Activities Zone.

Therefore the boundary of the Oval (Clapham Road) Local Centre should be amended to include 43-59 Clapham Road.

Draft Policy ED14: Hotels and other visitor accommodation (page 163)

The draft policy sets out that, in accordance with Draft London Plan Policy E10, outside of the Waterloo and Vauxhall Central Activities Zone (CAZ) and Opportunity Area, visitor accommodation will be supported in major and district town centres and will not be permitted outside of town centres. The draft policy also sets out a number of criteria and standards that new visitor accommodation should meet, including that: development does not compromise a site's capacity to meet the need for conventional residential dwellings; the impact upon neighbouring amenity should be assessed; proposals should make a positive contribution to townscape; include the highest standards of accessibility; and provide a management plan to assess the impact of additional visitor numbers in the local area.

As outlined above, Local Plans must be 'in general conformity' with the London Plan, which includes the draft version pending adoption.

Whilst Draft Policy ED14 states that it is in accordance with Draft London Plan Policy E10, it is more onerous than the draft London Plan policy as it specifically restricts new visitor accommodation outside of town centre locations. Draft London Plan Policy E10 seeks to 'promote' and 'encourage' new serviced accommodation in town centres but does not specifically preclude such development from occurring outside of town centres.

As such, Draft Policy ED14 is overly restrictive and not in conformity with the draft London Plan. We consider that removing the requirement for a town centre location will still ensure that only appropriate schemes come forward as the policy will continue to require visitor accommodation to be of an appropriate scale for the location and to not harm the balance and mix of uses, rather than precluding visitor accommodation development outside of town and district centres outright.

Therefore, part a) should be amended to state:

'Outside of the Waterloo CAZ boundary and Vauxhall Opportunity Area and CAZ boundaries visitor accommodation (C1) will be supported in major and district town centres. In these locations' visitor accommodation should be of an appropriate scale for the proposed location and should not unacceptably harm the balance and mix of uses in the area, including services for the local residential community. Additional visitor accommodation outside town centres will not be permitted.'

Should the requirement for a town centre location be retained in the draft Local Plan then it should be made clear that it applies to all centres within Lambeth's town centre hierarchy.

The current wording of draft Policy ED14 supports visitor accommodation in major and district town centres, but goes on to clarify that it is outside of town centres that additional accommodation will not be permitted. Therefore accommodation in local centres will be appropriate. Paragraph 6.101 again references major and district town centres, but the text should also clarify that visitor accommodation local centres will be appropriate.

Again, this is to ensure compliance with the Draft London Plan Policy E10, which, although not precluding non-town centre locations, promotes and encourages new serviced accommodation in town centres and well connected locations.

Therefore, in the event that a town centre location continues to be sought, Paragraph 6.101 (page 166) of the policy's support text should be amended to state:

"6.101. In major, and district and local town centres, when considering whether a proposal is of an appropriate scale, regard will had to the location of the site and local circumstances. 'Balance and mix of uses' will be assessed on a site by site basis having regard to the characteristics of an individual locality, including existing concentrations of visitor accommodation, and the nature and scale of the proposed development. Generally, two uses of this nature will not be permitted on adjacent sites. This assessment will take account of the visitor management plan provided and the potential to effectively mitigate negative impacts on the local area through planning obligations."

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

The draft policy outlines that proposals involving the complete loss of office floorspace will not be permitted unless a number of tests are met. These tests include the demonstration of continuous marketing for a period of at least two years, which has been increased from the one year period required under the currently adopted Local Plan. The tests also require appropriate supporting information and marketing evidence to demonstrate that it would not be feasible and/or viable to refurbish, renew, modernise or redevelop the offices or to adapt the floorspace as smaller business units to meet such demand.

It is considered that a period of two years is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. A blanket marketing period of two years before alternative uses are permitted will be overly onerous in that it will unnecessarily delay positive and appropriate schemes from coming forward. A one year marketing period continues to be appropriate

In addition, it is noted that Draft London Plan Policy E1 supports the redevelopment, intensification and change of use of surplus office space, whilst the supporting text of the policy details that surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. The supporting text goes on to say that evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document).

Given that the Draft London Plan sets out a requirement for a minimum of 12 months marketing, it is considered that Draft Lambeth Policy ED1 requiring two years is overly restrictive and not in general conformity with the London Plan.

Therefore, the original wording of the policy should be retained and draft Policy ED1 part c) amended to state:

'Proposals involving a complete loss of office floorspace will not be permitted unless the following tests are met.

- i. there is no demand for the office floorspace as demonstrated by evidence that the floorspace has been vacant and continuously marketed for a period of at least ~~one year~~ two years.'

Summary

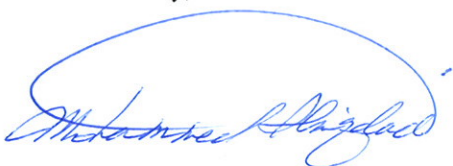
Overall, Tucan Investments welcomes the Council's vision for Lambeth and the steps to support sustainable development across the Borough. The amendments we have proposed above are informed by our experience as a developer of high quality schemes across London and the UK. It is considered that the suggested amendments to the draft policies will ensure compliance with the draft London Plan and allow them to be sound and effective.

Tucan Investments is committed to continuing to work in partnership with the Council to deliver strategic goals and the regeneration of sites in the borough to benefit local communities.

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

Should you have any queries or require any further information please do not hesitate to me on the details below.

Yours faithfully,



Mohammed Al-Miqdadi
Director
0207 602 7055
almiqdadi@gmhsa.com