

13th March 2020

By email:
localplan@lambeth.gov.uk

To whom it may concern,

We write with regard to the draft submission version of the Draft Local Plan on behalf of clients operating and developing within the borough.

Having reviewed the plan's contents, we are generally supportive of the ambitions of the plan, including its spatial vision and its focus on meeting the needs of its workforce, residents and visitors with regard to homes and jobs.

We have some specific comments/ suggestions with regard to particular policies in the plan, which we set out below.

Policy H1 – Maximising Housing Growth

Our clients fully support the principle and objectives of Policy H1, including to meet and exceed the housing targets as set out within the Intend to Publish London Plan (December 2019), supporting windfall sites and seeking to optimise densities where appropriate.

Policy H4 Housing size mix in new developments

Our clients support the policy thrust of providing a range and type of dwelling sizes, including supporting flexibility on this where appropriate.

Policy H13 – Large-scale purpose-built shared living

Whilst the amended text within Policy H13 is generally supported, we consider that it is amended to be flexible enough to allow for alternative locations for large scale purpose built shared living where this is justified, for example within easy reach of locations where demand for such accommodation may well be demonstrated (e.g. close to large and important local employers/ university campuses etc.).

We have added amended text in bold red/ red cross through text below:

“Policy H13 Large-scale purpose-built shared living

*Development proposals for large-scale purpose-built shared living will **generally only** 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:*

- 1. 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).

Large-scale purpose-built shared living will only be supported outside of Waterloo and Vauxhall where clear local need and demand can be demonstrated.

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.

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.

In addition, we also consider that the supporting text of Policy H13 should be amended to be more flexible in accordance with the text of the policy, and also ensure it is consistent with the Intend to Publish London Plan (December) Paragraph 4.16.3, which defines large-scale purpose-built shared living developments as generally comprising at least 50 units as follows:

"5.120. In Lambeth, large-scale purpose-built shared living developments are generally considered to consist of at least **30 50** non-self-contained units.

5.121. Proposals of this nature should **generally** 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. Car and cycle parking standards set out in the London Plan and Local Plan policies T7 and T3 will also apply."

We trust these representations are useful and look forward to receiving further details with regard to the Examination in Public.

Yours faithfully



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For and on behalf of Avison Young (UK) Limited