

Regulation 22(1)(c) Statement of London Borough of Lambeth  
in support of Draft Revised Lambeth Local Plan 2020-2035  
May 2020

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## 1.0 Introduction

### 1.1 Purpose

This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Draft Revised Lambeth Local Plan 2020 to 2035 in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) September 2015.

The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted Lambeth SCI 2015 can be viewed [here](#).

The Council has prepared a separate Duty to Cooperate Statement of Compliance dated May 2020, which is published on the examination webpage (Ref PD07).

### 1.2 Background

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the revised Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation/representations.

The Council began preparing a revised Local Plan for the borough in 2016, as a partial review to the plan adopted in 2015. The new Local Plan will set out the strategic vision, objectives and spatial strategy for the Borough, as well as the planning policies which will guide future development. The Plan will look ahead to 2035, and identify the main areas for sustainable development growth. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

The Local Plan will replace the adopted Lambeth Local Plan 2015. The Council intends to prepare a subsequent new Site Allocations Development Plan Document, which will supplement the revised Local Plan to form part of the development plan for the borough (along with the London Plan 2020 and Southbank and Waterloo Neighbours Neighbourhood Development Plan 2019).

The Council's Draft Revised Lambeth Local Plan Proposed Submission Version (January 2020) and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 for a six week consultation period lasting from Friday 31 January 2020 until Friday 13 March 2020. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents in accordance with the Statement of Community Involvement.

### 1.3 Structure of Statement

This statement of consultation comprises four sections:

Section 1 is an introduction.

Section 2 sets out the timeline which has been followed in preparing the revised Local Plan which is in accordance with the up to date [Lambeth Local Development Scheme October 2019](#) (SD06).

Section 3 summarises the main issues raised during the course of the consultation carried out under Regulations 18/19 and how the comments received have been considered by the Council.

Section 3 is supported by the two Appendices found at Section 4 setting out how consultation was undertaken, the responses received at Regulation 18 and 20 stages and how the comments have been taken into account by the Council.

## 2.0 Plan Production Timeline

The timetable below outlines the main stages in the preparation of the Draft Revised Lambeth Local Plan up until the submission date of 22 May 2020. An account of this process, with links to key documents at each stage, can also be found on section 3 of this webpage:

<https://www.lambeth.gov.uk/planning-and-building-control/planning-policy/lambeths-local-plan-guide>

The process has involved a partial review of the Lambeth Local Plan 2015, necessary to take account of changes in national policy and guidance, the review of the London Plan and new evidence. From the outset, the intention was for the revised Lambeth Local Plan to be in general conformity with the emerging new London Plan. The timing of each stage was therefore informed by the key stages in the production, consultation and examination of the Draft London Plan. The Intend to Publish Draft London Plan was published in December 2019 and the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV) seeks to be in general conformity with that version. All references in this document to the London Plan are therefore to the emerging new London Plan.

As stated throughout the process of reviewing the Local Plan, in the Lambeth Local Development Scheme and at paragraph 1.6 of the DRLLP PSV, a separate Site Allocations Development Plan Document (SADPD) will be prepared to follow the revised Local Plan. Whilst some of the adopted site allocation policies are deleted in the DRLLP PSV, no changes are proposed to those that remain. Where necessary, these will be reviewed as part of the SADPD, alongside proposed new site allocation policies. Therefore all comments on site allocations will be retained and considered by the Council as part of the SADPD preparation process.

### **Key Local Plan Stages Undertaken**

#### *1: Consultation on issues for the partial review - October 2017*

Following preparatory work during 2016 and 2017, the resolution to undertake a partial review of the Lambeth Local Plan 2015 was taken by [Cabinet on 2 October 2017](#), along with agreement to an initial round of public consultation on issues for the partial review. This consultation took place over eight weeks between 9 October and 4 December 2017 under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 (see further information in Appendix 1).

#### *2: Draft Local Plan consultation - October 2018*

Taking account of the responses to the issues consultation in 2017, a decision was taken by [Cabinet on 15 October 2018](#) to consult on a full Draft Revised Lambeth Local Plan 2018 and Proposed Changes to the Policies Map 2018, along with associated evidence and Sustainability Appraisal. This consultation took place over eight weeks between 22 October and 17 December 2018 under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 (see further information in Appendix 1).

### *3: Plan amendments – January to December 2019*

The Council made changes to the draft revised plan to address comments received during consultation on the Draft Revised Lambeth Local Plan 2018, recommendations from the Sustainability Appraisal, changes in the London Plan as a result of the examination of that document, changes in national planning policy and guidance and general factual updates (see more detail in Appendix 1 Schedule 2). The Sustainability Appraisal and evidence base documents were updated, a consultation report and topic papers were produced and statements of common ground with other planning authorities were agreed to support publication of the DRLLP PSV.

### *4: Pre-Submission Publication Regulation 19 – January to March 2020*

Following a resolution by [Cabinet on 13 January and Council on 22 January 2020](#), the DRLLP PSV and associated Proposed Changes to the Policies Map (January 2020) were published for comment for a 6 week period between 31 January and 13 March 2020. Supporting documents were also published during this period, including the consultation reports on the Regulation 18 consultations, the updated Sustainability Appraisal (incorporating HRA and equalities and health and well-being impact assessment), a full evidence base, topic papers and statements of common ground with other planning authorities. In accordance with Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012, representations were invited specifically on the Plan's legal compliance and soundness for examination. See further information in Appendix 2 Schedule 1.

### *5: Submission to the Secretary of State - May 2020*

The decision by Cabinet and Council in January 2020 (see link above) also included a resolution to submit the DRLLP PSV to the Secretary of State for examination following the conclusion of the pre-submission publication period. This Consultation Statement sets out the Council's consideration of the representations received under Regulation 20 in response to Regulation 19 publication (Appendix 2 Schedule 2).

### *6: Examination - summer/autumn 2020*

The Plan will be examined by an independent Planning Inspector(s) on behalf of the Secretary of State for Housing, Communities and Local Government.

### *7: Adopt - early 2021*

## 3.0 Summary of Process and Main Issues

### **Summary of the consultation process for the partial review of the Lambeth Local Plan**

Public consultation under Regulation 18 of the Town and Country Planning (Local Plans)(England) Regulations 2012 took place in two stages. Stage 1 involved an initial round of consultation on issues for the partial review of the Local Plan over eight weeks between October and December 2017. Stage 2 involved consultation on a full Draft Revised Lambeth Local Plan and took place over eight weeks between October and December 2018. Appendix 1 provides details of how the requirements of Regulation 22(1)(c) (i) to (iv) have been met in relation to the Regulation 18 consultation, including which bodies and persons the local planning authority invited to make representations; how they were invited to make representations; a summary of the main issues raised by the Regulation 18 representations; and how those representations have been taken into account.

Regulation 19 pre-submission publication took place for six weeks between January and March 2020. Appendix 2 (which includes Schedules 1 and 2) provides details of how the requirements of Regulation 22(1)(c)(v) have been met, namely the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. A Council response is also provided to the main issues raised. A high level summary of the main issues raised at Regulation 19/20 is also given below.

#### **Main Issues raised pursuant to Regulations 19/20:**

Nine responses made no comment or raised no issue with the DRLLP PSV. These were from: R002 Gloucestershire County Council, R003 Natural England, R005 National Grid, R006 Highways England, R008 Historic England Archaeology, R009 London Parks and Gardens Trust, R012 Miss Bolante Ayekoti, R017 Surrey County Council, R075 Environment Agency.

No comment was made about any aspect of the Sustainability Appraisal or HRA Screening Assessment.

The Mayor confirmed on 13 March 2020 that the DRLLP PSV was in general conformity with the London Plan (considered in relation to the Draft London Plan Intend to Publish version December 2019), but made a number of comments on wording (including detailed comments from Transport for London). The Mayor's letter stated that he had received the response from the Secretary of State to his Intend to Publish London Plan (issued on 13 March 2020) and that he was considering his response.

By section of the Plan, the main issues raised pursuant to Regulations 19/20 were:

## Section 1 – Introduction

A request to refer to cross boundary delivery of infrastructure to make the plan effective (Coin Street Community Builders). A request to amend the reference to extending the tram network to Crystal Palace (Transport for London).

## Section 2 – Evidence base and issues

Requests to include references to supporting step-free access at stations through developer contributions, Blackfriars and Crossrail 2 (Transport for London). Objections on grounds that not positively prepared to lack of provision for youth facility in Waterloo and South Bank (Coin Street Community Builders); and on grounds of ineffectiveness to lack of reference to libraries (Friends of Lambeth Libraries).

## Section 3 – Spatial strategy, vision and objectives

Objection that lack of plan for libraries is inconsistent with national policy (Friends of Lambeth Libraries); and that lack of exploration with Thames Water into potential to re-purpose sites as parkland is not positively prepared (Blenheim Gardens RMO).

## Section 4 – Delivering the vision and objectives

Suggestion that policy should include a requirement for applicants to submit a health and well-being impact assessment with larger applications (HUDU for CCG). Concerns about lack of effectiveness, justification and consistency with national policy and/or requests to update the policy on planning obligations to be consistent with revised CIL Regulations (Department of Education, HUDU for CCG, Home Builders' Federation). Request to include a cross-reference to London Plan policy DF1 (Transport for London). Request to be consulted on planning obligations before they are agreed (WeAreWaterloo BID).

## Section 5 – Housing

*Housing supply* - The plan is not positively prepared because it fails to plan effectively to meet London's unmet housing need through cooperation with other boroughs and it relies on the Mayor's flawed method for optimising capacity on small sites and on windfall supply (Home Builders' Federation). There is insufficient commitment to maximising housing delivery, particularly on industrial land and in light of the Secretary of State direction on the London Plan (Caddick Developments).

*Affordable housing* – Overall approach supported but some slight amendments requested (Mayor of London). The approach to collecting affordable housing obligations on sites with fewer than ten units is contrary to national policy; policy is not clear on the percentage of affordable housing required overall; tenure split requirements are not in general conformity with the London Plan; viability evidence has questionable inputs (Home Builders' Federation). The policy is not in general conformity with the London Plan (Grainger plc). There should not be a blanket cap on shared ownership where market sales values exceed £600,000; and recognise that 2B4P homes can contribute towards family housing provision (L&Q).

*Housing standards* – There should be more flexibility on external amenity space requirements for flatted developments because the policy requirements are not always achievable (Bellway Homes). The requirement for dual aspect accommodation is not in general conformity with the London Plan and not justified (Grainger plc).

*Residential conversions* - Objection to the deletion of the section allowing house de-conversions because not justified (James Burton). Removal of the conversion stress approach is not justified (Stockwell Park RA, James Burton, Ms H Armstrong). Replace 'as originally constructed' to make it easier to verify (Brixton Society).

*Student housing* – The requirements of the policy are not justified and/or onerous and/or not consistent with the London Plan and national guidance (Alumno Group). The tests of over-concentration and mixed and balanced communities are onerous and not justified, effective or consistent with national policy (Unite Students, Alumno Group).

*Older people's housing* – The policy should give more explicit support for this form of housing to be positively prepared and sites should be allocated (Home Builders' Federation, Coin Street Community Builders). Delivery should be monitored against the London Plan benchmark to be consistent with the London Plan; clause (d) is too restrictive and will constrain supply (Home Builders' Federation).

*Gypsies and travellers* – The plan does not take account of the Mayor's new definition (Mayor of London).

*Estate regeneration* – The policy does not take account of scheme viability and is not consistent with the London Plan (Bellway Homes, L&Q). There should be flexibility on tenure; and clarify what should happen to proceeds of shared ownership sales (L&Q). Include a requirement for resident ballots; infill development should only be supported to enable phasing; embodied energy should be taken into account (Brixton Society). Make clear to which schemes the policy applies (Grainger plc).

*Build to Rent* – The Lambeth-specific requirements are restrictive, not justified, not in general conformity with the London Plan, not consistent with national policy and guidance (TfL Commercial Development, Connected London Living, Grainger plc).

*Purpose-built shared living* – To be positively prepared, there should be more flexibility on locations supported; the approach is not justified (Caddick Developments, Avison Young for unspecified developer). The Lambeth-specific requirements are not justified, effective or consistent with national policy and not in general conformity with the London Plan (Unite Students, Olympian Homes, Caddick Developments).

#### Section 6 – Economic development, retail and town centre uses

*Offices* – Amend the wording on out of centre locations to be fully consistent with the London Plan (Mayor of London). To be positively prepared and effective, the policy should give additional flexibility to allow loss of offices, encourage new forms of workspace, and around the requirement for a proportion of flexible workspace for SMEs (KCH Foundation Trust, Coin Street Community Builders, MEC Property Ltd). The requirements on fit-out are not justified or positively prepared (Coin Street Community Builders, Arch Company). The policy is not justified as it does not address co-working space in non-office developments (PPHE Hotel Group). The requirement for replacement floor-space should be clarified (Hondo Enterprises). The requirement for two years' marketing is overly restrictive and contrary to the London Plan (Tucan Investments Ltd). Application of the 1,000 sqm threshold should be clarified (Arch Company).

*Affordable workspace* – The requirement for affordable workspace on gross floor-space and not just uplift is not positively prepared, justified, or effective, and is not consistent with the aims of the London Plan or with national policy (WCPS, Bourne Capital, Stanhope plc, Hondo Enterprises, Caddick Developments, MEC London Property). To be effective there should be additional flexibility within the policy (WCPS, Andrew Sissons Consulting, Kessler (SLR) Ltd, GST Charity, HB Reavis, Bywater Properties, Stanhope plc, Hondo Enterprises). Concerns about the assumptions used in the viability evidence that justifies the policy (WCPS, Unite Students, Arch Company, Bourne Capital). Concerns regarding the viability implications of the policy requirements on development (Andrew Sissons Consulting, Arch Company, Hondo Enterprises, MEC London Property). The requirement for viability reviews is unjustified and inconsistent with national policy (Arch Company). Requests for clarification on application of the policy (GST NHS Foundation Trust, Caddick Developments, Arch Company). Concerns about whether the affordable workspace thresholds and locations applied are justified and effective (Bywater Properties, Bourne Capital, Brixton Society).

*Industrial land* – The policy approach is welcomed but emphasise Lambeth's location in the Central Services Area and include fuller explanation of the strategic approach in supporting text; give more focus to B2 and B8 uses and to potential for industrial intensification (Mayor of London). The policy on KIBAs is too restrictive and should allow offices, so is not justified or effective; consider the implications of the Secretary of State direction on the London Plan (Andrew Sissons Consulting, Workspace Management Ltd, Bywater Properties). Some existing KIBAs are primarily in office use so are not industrial, so their designation is not justified (Workspace Management Ltd, Caddick Developments). Potential for co-location with residential in KIBAs has not been properly considered and should take account of the Secretary of State's direction on the London Plan (Bywater Properties, Caddick Developments). The reference to stacked industrial forms is not justified

(Andrew Sissons Consulting). Further flexibility should be allowed on non-designated industrial land to be an effective approach (Andrew Sissons Consulting, Arch Company, KCH Foundation Trust).

*Railway arches* – Part (b) of the policy is too restrictive so not justified, effective or positively prepared, and not consistent with national policy; and part (d) should be applied in a proportionate way (Arch Company, Network Rail).

*Town centres, food and drink uses, visitor attractions, leisure, arts and cultural uses* – Allow town centre uses at edge-of-centre and out-of-centre locations (Unite Students). Scale is no longer a national policy test for town centre uses (London Hotels Group). Policy on food and drink uses is ineffective because it does not address emerging trends (Brixton Society); and it is not positively prepared, justified or effective in relation to hot food take-aways, KFC (GB) Ltd). Refer to CAZ retail clusters to be effective and consistent with national policy; no reference to the contribution made by the evening economy in the Strategic Cultural Area (BFI). Introduce more flexibility to policy on visitor attractions where justified (Theatres Trust, TfL Commercial Development).

*Visitor accommodation* – The approach to hotels outside town centres is not consistent with the London Plan or national policy; there is not justification for excluding local centres (London Hotel Group, Tucan Investments Ltd, Espalier Ventures and MELT Property). Scale is no longer a test in national policy and this approach is not justified (London Hotel Group). The approach in Vauxhall is too restrictive, not justified and not consistent with the London Plan (TfL Commercial Development, London Hotel Group). The approach in Waterloo is too restrictive, not justified and not consistent with the London Plan (Marlin Apartments, Espalier Ventures and MELT Property, PPHE Hotel Group, Waterloo Hub Hotel Ltd, Southbank Hotel Management Company, London Hotel Group). Part (e) is not justified or effective (Espalier Ventures and MELT Property, Waterloo Hub Hotel, Southbank Hotel Management Company, London Hotel Group). The requirement to provide facilities for business visitors is onerous on small hotels (TfL Commercial Development). The policy is ineffective because it does not adequately address coaches, taxis and deliveries (Brixton Society).

*Employment and training* – The 25 percent jobs requirement is onerous, unjustified, not consistent with national policy or the London Plan (TfL Commercial Development, GSTT, HB Reavis, Hondo Enterprises, MEC London Properties). The policy should not apply to change of use applications as this is not consistent with national policy (Arch Company).

## Section 7 – Social infrastructure

Policy S1 is not consistent with national policy because it allows for payments in lieu which does not ensure adequate replacement of playing fields (Sport England); and is not effective in protecting facilities because it allows for payments in lieu and loss of floorspace (Friends of Lambeth Libraries). To be effective there should be more flexibility in the policy (Department for Education, London Fire Commissioner, GST NHS Foundation Trust). Not positively prepared because insufficient reference to libraries and the plan fails to identify sufficient sites for schools (Friends of Lambeth Libraries, Brixton Society). Delete the reference to the Council's agreed strategy for provision of school places as not consistent with national policy (Department of Education).

## Section 8 – Transport and communications

Various requests for additional references, corrections and clarifications throughout the section (Transport for London). Requirements for cycle charging points and/or cycle hire membership and/or Sheffield stands and/or pool bikes and/or car club membership are too onerous or unjustified (Home Builders' Federation, L&Q, Grainger, Unite Students). To be effective, more flexibility on cycle parking should be provided and provision for folding bikes should be considered (Arch Company, HB Reavis, Hondo Enterprises). Contributions from development towards public transport infrastructure should be proportionate to projected trips arising (HB Reavis). Add references to bus corridor improvements and East Brixton Station (Brixton Society). The approach to EV charge points is ineffective and needs further consideration (Home Builders' Federation). Allow site specific solutions to disabled parking solutions (HB Reavis). To be effective, policy should promote consolidation of deliveries even where a traditional consolidation centre is not used (HB Reavis). Policy should recognise the particular characteristics of taxis; as drafted it is not justified or effective (United Cabbies Group). Telephone boxes are not adequately addressed (WeAreWaterloo BID).

## Section 9 – Environment and green infrastructure

*Open space and green infrastructure* – Clarification sought on the approach to calculating planning obligations; the reference to biodiversity gain should be deleted because it will be superseded by national regulation so is inconsistent with national policy (Home Builders' Federation). There should be more flexibility in the policy to improve effectiveness (Department of Education, Bywater Properties, Bellway Homes). The approach is ineffective because it will aggravate open space deficiency (Brixton Society). The policy is inconsistent with national policy because it does not provide adequate protection for playing fields (Sport England).

*Energy* – The policy should be deleted because it will inhibit innovation (Home Builders' Federation, Grainger plc).

*Sustainable design and construction* – The policy does not distinguish adequately between historic buildings and modern development (Historic England). The policy is unjustified and should not set standards for environmental performance of new homes that exceed those in national regulations or the London Plan (Home Builders’ Federation).

*Waste* – Some concerns about the approach to planning for waste capacity in the borough (Mayor of London). Lambeth should offer surplus waste capacity to other boroughs and release waste sites (Norwood Action Group et al). Clarification requested about the role of the Western Riverside Waste Authority (Western Riverside Waste Authority).

#### Section 10 – Quality of the built environment

*Urban design* – To be effective, clarify how optimum future development will be assessed (Bywater Homes).

*Building alterations and extensions* – Concern about loss of flexibility in the approach to retaining garden area (James Burton).

*Cycle storage* – Remove reference to viability and adopt a more flexible approach to using highway space; add reference to London Cycling Design Standards (TfL). Cycle parking standards for student accommodation are excessive and unjustified (Unite Students).

*Development in gardens and amenity spaces* – Define the retained garden space in square metres rather than as a percentage (Brixton Society).

*Westminster World Heritage Site* – Include a reference to the weight to be given to public benefits in decision-making (GST NHS Foundation Trust).

*Listed buildings* – The requirement for single glazing is unjustified (Crispin Royle-Davies).

*River Thames* – Delete unnecessary repetition (Port of London Authority)

*Views* – Request for co-operation when preparing the Local Views SPD (LB Southwark). Concern about Lambeth local views constraining development in Croydon (LB Croydon). Do not add any new views in the Local Views SPD (GST NHS Foundation Trust).

*Tall buildings* – Include a reference to the weight to be given to public benefits in decision-making (GST NHS Foundation Trust). The definition of tall buildings is not consistent with national policy (Kessler (SLR) Ltd, Brixton Society). Parts of the policy are not in general conformity with

the London Plan (Kessler (SLR) Ltd, Historic England). The requirement for a clear and convincing justification in part (b) is ambiguous because undefined (Kessler (SLR) Ltd). Give more consideration to tall buildings located in close proximity, daylight, over-shadowing, privacy (Brixton Society).

*Basement development* – Specify railings or balustrades for Victorian properties (Brixton Society). Parts of the policy are onerous, unjustified and inconsistent with the London Plan (London Hotel Group).

### Section 11 – Places and neighbourhoods

*PN1 Waterloo and South Bank* – Requests for corrections to introductory paragraphs (WCDG, LB Southwark, TfL). The policy does not recognise the significance of the residential community, the potential for more housing or the need for more affordable housing; and the long term place-making objectives are not clear (WCDG). The approach in the CAZ retail cluster is not appropriate and/or requires clarification (WCDG, WeAreWaterloo BID, GSTT Charity, Stanhope plc). To be effective and consistent with national policy, consider other complementary non-office uses (PPHE Hotel Group). Remove references to the Waterloo and South Bank Public Realm Framework because not agreed following consultation (CSCB, WCDG, SBEG, Jubilee Gardens Trust). The approach to Hungerford Car Park and extension of Jubilee Gardens is not effective, justified and/or positively prepared because it does not adequately consider maintenance, servicing, toilets (Jubilee Gardens Trust, WCDG, M Evers). The approach to views into Jubilee Gardens is erroneous and unsound, resulting in an area of unusable MOL (WCDG, Friends of Jubilee Gardens, M Evers). Coaches should be discouraged and managed (WCDG, M Evers). There is insufficient rationale for the reconfiguration of the IMAX roundabout (WCDG); the policy should recognise the importance of retaining the IMAX in its current location (BFI). Amend the reference to an agreed high level masterplan for Royal Street as it may delay development proposals (GSTT Charity, GST NHS Foundation Trust, Stanhope plc).

*PN2 Vauxhall* – Recognise that housing can be delivered through a range of housing products (Alumno Group, Olympian Homes). To be effective include reference to retail and leisure uses to deliver the 'active spine' (Arch Company, Network Rail). Requests for corrections/factual updates (TfL, Brixton Society).

*PN3 Brixton* – The approach to managing uses in the town centre is not effective, justified or consistent with national policy; revise the approach to railway arches (Arch Company, Network Rail). Clarify the approach to calculating percentages of uses; make provision for workspace for messy and noisy uses rather than flexible commercial uses; clarify expectations on particular sites (Brixton Society). To be effective use units rather than floorspace in the indoor markets, and clarify the approach to A4 uses (Hondo Enterprises). Continue to discuss the town centre transport improvements identified with TfL (TfL). Planning obligations should be applied reasonably and proportionately (Arch Company, Network Rail).

*PN6 Stockwell* – Take positive action on air quality and traffic reduction; allow solar panels on buildings in conservation areas; designate Slade Gardens as MOL (Stockwell Park RA). Discuss potential for reducing road severance (TfL).

*PN7 West Norwood and Tulse Hill* – Corrections and factual updates sought (Norwood Action Group et al). Amend the reference to two way working at the gyratory to allow consideration of other feasible options (TfL).

*PN8 Kennington/Oval* – Request for factual corrections (TfL)

*PN9 Herne Hill* - Tying numbers of arches to specific uses/percentages is not consistent with national policy, effective or justified (Arch Company, Network Rail). There is insufficient reference to Herne Hill; there should be cross-border cooperation (Catherine James).

*PN10 Loughborough Junction* – Concern about being unable to comment and request for various amendments to wording (LJAG/LJNF). Further clarity required about protection for specific facilities for young people (LJAG/LJNF, LJNF, Brixton Society). Refer to potential for public realm improvements at Hero or Switzerland (UDN Redevelopment). Add reference to expansion of London Cycle Hire; be cautious about promotion of car clubs (TfL). Tying numbers of arches to specific uses/percentages is not consistent with national policy, effective or justified (Arch Company, Network Rail). Part (a) is too reactive and will give sufficient protection from harm (Brixton Society).

*PN11 Upper Norwood/Crystal Palace* - Amend the reference to Crystal Place Park SOLDC (LB Bromley). Remove the reference to extension of the Tram network (TfL).

## Annexes

*Annex 10* – To be consistent the national guidance and the London Plan, the HUDU model should be used for calculating contributions in lieu of on-site social infrastructure (HUDU for CCG). The methodology for calculating payments in lieu of affordable workspace is too restrictive (Stanhope PLC). The approach for calculating contributions to mitigate the impact of visitor attractions as not related to true costs so is not justified (U and I Group PLC).

*Annex 11* – Requests for changes to the locations identified as appropriate for tall buildings and/or indicative heights to reflect permissions granted or potential for new development as the approach is not justified (U and I Group PLC, Coin Street Community Builders, Guy's and St Thomas' NHS Foundation Trust, Arch Company, Hondo Enterprises)

*Annex 14* – Request to delete the map showing Strategic Areas of Regeneration as its purpose is not clear (Brixton Society)

## Site allocations

A number of comments were raised about existing site allocation policies 1 (GSTT Charity, Stanhope plc), 2 (Notting Hill Genesis), 5 (TfL), 9 (PLA, MEC London Property, TfL, Harrison Homes), 10 (U&I Group plc, London Fire Commissioner, Mayor of London), 11 (Olympian Homes), 13 (TfL and TfL Commercial Development), 16 (TfL) and 18 (Norwood Action Group et al) and a site was proposed for new site allocation (GST NHS Foundation Trust). As stated in section 2 above, site allocation policies are not being amended as part of the Local Plan Review. These comments will therefore be considered by the Council during the preparation of the forthcoming Site Allocations DPD (timetable as set out in the Local Development Scheme (SD06)).

## Proposed Changes to the Policies Map

In relation to the Proposed Changes to the Policies Map, the main issues raised were:

*Key Industrial and Business Areas (KIBAs)* - Some of the proposed changes to KIBA designations are not justified (Engineering Force Ltd, U and I Group, Workspace Management Ltd, London Fire Commissioner, Brixton Society). Objections to proposed new KIBA designations because not justified (Network Rail, Acoustic Group). To be justified and effective, a different approach should be considered for some specific KIBAs (Caddick Developments, Andrew Sissons Consulting, Bywater Properties). Query about intention in KIBAs identified for intensification and co-location (Mayor of London).

*Town Centres* – Objections to some proposed town centre boundary changes on the basis that they are not justified, effective or positively prepared (Arch Company, Network Rail). Request for amendment to one local town centre boundary (Espalier Ventures and MELT Property, Tucan Investments Ltd). Concern about extent of the boundary of the Brixton Evening Economy Management Zone (Brixton Society).

*Sites of Importance for Nature Conservation (SINCs)* – Request to de-designate a SINC as this will stymie development (Harrison Homes). Request to designate a new SINC (Brixton Society).

*Immediate Setting of the Westminster World Heritage Site (WWHS)* – Two requests to change the extent of the area defined as the immediate setting of the WWHS (Guy's and St Thomas' NHS Foundation Trust, Southbank Centre).

#### Infrastructure Delivery Plan (evidence base document)

Request for an amendment to one project (HUDU for CCG). It should include a prioritised programme of projects (Coin Street Community Builders). It should include a car pound and non-property related policing infrastructure (Metropolitan Police). A body should receive CIL funding and be exempt from CIL charges (Guy's and St Thomas' NHS Foundation Trust). It omits libraries to address growth over 35 years (Friends of Lambeth Libraries). Sports and physical activity strategies and Playing Pitch Strategy are out of date so a commitment to update them is required (Sport England).

A fuller summary of the main issues raised is provided in Appendix 2 Schedule 2, along with the Council response.

#### **Conclusion**

Section 3 and Appendix 1 (including Schedule 1) explain which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the Council's SCI 2015. Summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18 are provided and include an explanation of how these were taken into account in the preparation of the DRLLP PSV, with a summary provided in Appendix 1 Schedule 2. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

Section 3 and Appendix 2 (including Schedule 1) explain which bodies and persons were invited to make representations under Regulation 19 and how, in accordance with the plan-making Regulations and the Council's SCI 2015. Schedules 1 and 2 set out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

## Appendix 1

This appendix addresses the requirements of Regulation 22(1)(c) (i) to (iv) and sets out:

- (i) Which bodies and persons the local planning authority invited to make representations under Regulation 18
- (ii) How those bodies and persons were invited to make representations under Regulation 18
- (iii) A summary of the main issues raised by the representations made pursuant to Regulation 18
- (iv) How any representations made pursuant to Regulation 18 have been taken into account.

### 1) Introduction

Public consultation under Regulation 18 of the Town and Country Planning (Local Plans)(England) Regulations 2012 took place in two stages.

**Stage 1** involved an initial round of consultation on issues for the partial review of the Local Plan over eight weeks from 9 October to 4 December 2017. 1,309 responses were received (1,185 via an on-line survey and 124 by email or post). In addition, approximately 90 people attended events or meetings.

**Stage 2** involved consultation on a full Draft Revised Lambeth Local Plan and took place over eight weeks from 22 October to 17 December 2018. 330 written representations were received from a wide range of stakeholders, covering some 2,400 different points. Of these, 233 were submitted by email or letter and 97 via the on-line questionnaire.

Section 2 of this Appendix, along with Schedule 1, sets out which bodies and persons were consulted and how that was undertaken.

Section 3 of this Appendix provides links to the reports that summarise the main issues raised in response to these consultations and the response of the Council indicating how the comments were taken into account in the next stage of Plan preparation. A summary of the key changes made to the draft plan between Regulation 18 and Regulation 19 is included in Schedule 2.

Section 4 of this Appendix sets out a conclusion on the efficacy of the Regulation 18 consultation process.

### 2) Who was consulted under Regulation 18 and how that was undertaken?

#### **Stage 1 – consultation on issues for the review (Oct-Dec 2017)**

In accordance with pages 15-16 of the Council's [Statement of Community Involvement 2015](#) (SD07) a wide range of methods were used to raise awareness about the consultation and to encourage people to respond, particularly harder to reach groups. This included email notifications to all those on the Council's planning policy consultation database (which includes the statutory, specific and general consultation bodies required by the Regulations) and to wider lists of contacts; letters to landowners; an article in the Council newsletter (Lambeth Talk); posters in libraries, schools and community centres; blog posts and social media. The publicity methods aimed to target the full range of stakeholders, including those who had been characterised as 'un-engaged' or 'harder to engage'. In addition to more traditional publicity methods, ward councillors, community groups and networks were encouraged to raise awareness about the consultation through word of mouth and 'cascading' amongst their constituents and members.

The main consultation method was an on-line survey. This was supplemented by ten consultation sessions with stakeholder groups and a presentation and workshop at the Lambeth First conference. Ten issues for the Local Plan review were identified for stakeholders to provide comments on: • Housing growth and infrastructure • Affordable housing • Housing for older people • Self-build and custom-build • Business and jobs • Town centres • Hotels and visitor accommodation • Improving air quality • Transport • Waste. For each issue, a series of questions was asked. These questions were developed around known areas of debate; in response to new forms of development; in response to government guidance; and in relation to perceived policy gaps. Stakeholders were also able to identify other issues they thought should be reviewed and to make comments on the Sustainability Appraisal.

Hard copies of the consultation documents were made available in all Lambeth libraries and at the Council's main offices.

Schedule 1 of this Appendix provides links to further information about who was contacted and how, and who responded.

## **Stage 2 – consultation on the Draft Revised Lambeth Local Plan (Oct-Dec 2018) (DRLLP 2018)**

Alongside consultation on the DRLLP 2018, [Local Plan Review issues consultation 2017 feedback summary sheets](#) (SD16b) were published summarising how these responses from the Stage 1 consultation had been taken into account in formulating the draft policies. This was in addition to publication of the full Issues Consultation Report and Appendices (links provided above). Other supporting documents were also published for comment, including the updated Sustainability Appraisal and the evidence base.

In accordance with pages 15-16 of the Council's [Statement of Community Involvement 2015](#) (SD07), a wide range of methods were used to publicise the consultation. Emails were sent to 1,875 organisations and individuals on Lambeth's planning policy consultation database at the start of the consultation, with follow up emails sent part-way through the consultation period. This database includes the statutory, specific and general consultation bodies required under the 2012 plan-making Regulations. See Schedule 1 of this Appendix for the list of those contacted. Further emails were sent to those on other Council mailing lists, including 5,978 recipients of the 'Cycling and Sustainable Transport of Planning applications' list and to 6,844 recipients of the 'Have your say on what is happening in Lambeth' list. Articles publicising the consultation were placed in Lambeth Talk, the Council's quarterly magazine distributed to 131,000 homes and businesses in the borough; on the Council's

website; and on the Council's blog – Love Lambeth. The Council also sent tweets from the council's Twitter account, alerting its followers to the consultation. Presentations publicising and explaining the consultation were made on request to the Landlords' Forum and the Norwood Action Group/Planning Assembly during November 2018.

Consultees were invited to respond in writing by email or letter, or via an on-line questionnaire that allowed respondents to relate their comments to specific sections or policies in the DRLLP.

Hard copies of the consultation documents were made available in all Lambeth libraries and at the Council's main offices.

Schedule 1 of this Appendix provides further information about who was contacted and who, and who responded.

### 3) Main Issues raised in Plan order including the Council response/action

#### **Stage 1 – consultation on issues for the review (Oct-Dec 2017)**

Section 3 of the [Issues Consultation Report October 2018](#) (SD15) gives a full account of all of the responses received to the issues consultation between October and December 2017. A summary is provided on page 13 of the report (section 3.3.). The [Local Plan Review issues consultation 2017 feedback summary sheets](#) (SD16b) summarise how the comments were taken into account when drafting the policies in the Draft Revised Lambeth Local Plan October 2018.

#### **Stage 2 – consultation on the Draft Revised Lambeth Local Plan (Oct-Dec 2018)**

Section 3 of the [Draft Revised Lambeth Local Plan October 2018 Consultation Report \(December 2019\)](#) (SD16a) sets out in full every comment received and the Council's response (including any changes made to the wording of the DRLLP PSV), in Plan order organised by section of the Plan. A breakdown of the 330 respondents by demographic characteristic is provided on page 4; and an overall summary of the response to the key elements of the DRLLP is provided on page 6. Schedule 1 of this Appendix provides a list of who responded to this consultation. A summary of the key changes to the DRLLP made between Regulation 18 consultation in October 2018 and Regulation 19 in January 2020 is provided in Schedule 2 of this Appendix.

### 4) Conclusion

The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the plan-making Regulations and the approach set out on pages 15-16 of the Council's [Statement of Community Involvement 2015](#) (SD07). Links have also been provided to summaries and full reports of the main issues raised by the representations made pursuant to Regulation 18, which includes an explanation of how these were taken into account in the

preparation of the DRLLP PSV. Further detail is provided in Schedules 1 and 2 of this Appendix. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

## Appendix 1 Schedule 1: Details of the consultation undertaken under Regulation 18

For stage 1 of the Regulation 18 consultation, details of who was contacted, the methods and materials used and who responded are set out in Section 2 of the [Issues Consultation Report October 2018](#) (SD15) plus the [Issues Consultation Report Appendices October 2018](#) (SD15a).

For stage 2 of the Regulation 18 consultation, the table below lists who was contacted and who responded by type of respondent. Section 2 of the [Draft Revised Lambeth Local Plan October 2018 Consultation Report \(December 2019\)](#) (SD16a) gives further detail on the methods used for the consultation and the demographic characteristics of respondents to the on-line questionnaire.

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
Affordable housing provider	58	5	Iroko Housing Cooperative
			Ekaya Housing Association
			Watmos
			London and Quadrant Housing Trust
			Iroko Housing Co-op
Business	51	10	Acme
			Engineering Force
			Sonica Studios Ltd
			Planware Ltd for McDonald's Restaurants Ltd.
			TPA Planning & Environment Ltd for Acoustic Group Ltd

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			SSA Planning for Kentucky Fried Chicken (Great Britain) Ltd Michael Ruh Studio Sandfish Ltd. Business Reyco
Business improvement district	11	5	WeAreWaterloo BID South Bank Employers' Group and South Bank BID Vauxhall One BID Station to Station DIB InStreatham BID
Community group	560	13	Norwood Action Group et al Loughborough Junction Neighbourhood Forum Brixton Rec Users Friends of Ruskin Park Friends of Jubilee Gardens Reroot.Ed Collective

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Loughborough Junction Action Group The Brixton Society Waterloo Community Development Group (WCDG) Jubilee Gardens Trust Friends of Agnes Riley Gardens Friends of Lambeth Libraries Bankside Open Spaces Trust
Developer/landowner	264	50	Dalton Warner Davis LLP for Euro Label Printers Heritage Properties Ltd LCR Property GL Hearn for BFI Wildstone Planning for Arrant Land Ltd DP9 for Citygrove Securities Plc Q+A planning for London Hotel Group DP9 for Bourne Capital Barton Willmore for Workspace Group

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Lichfields for U+I Group PLC
			JLL for Grainger PLC
			Montagu-Evans for Premcor Estates Limited
			Wildstone Planning for Black Prince Trust
			Wildstone Planning for Avenbury Properties Ltd.
			Eco World London Development Company Ltd
			JLL for Whitbread PLC
			Rapleys LLP for BizSpace
			Quod for Travis Perkins PLC
			Mark Fairhurst Architects
			DP9 for VCI Holding Ltd
			Artemis One Developments Limited
			Union 4 planning for Caddick Developments
			Arriva London
			Iceni Projects for Cashco
			Savills for Guy's and St Thomas' Charity

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Savills for Wetherby Ltd
			DP9 for Hondo Enterprises
			Quod for Southbank Centre
			Rolfe Judd for Urban and Provincial Capital
			Savills for Aldmarch Ltd
			Canary Wharf Group PLC
			Rolfe Judd for Workspace Group Plc
			DP9 for HB Reavis
			HGH Consulting for Level (1) SE1 Limited
			National Theatre
			TfL Commercial Development
			Boyer Planning for CLS Holdings Ltd
			Gerald Eve LLP for Stanhope Plc
			Savills for Gold Diamond D County Hall 2013 Ltd
			HGH Consulting for Stockwell Group Practice
			Lichfields for PPHE Hotel Group

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			DP9 for CLS Holdings Ltd ROK Planning for Unite Students DP9 for ITV PLC Montagu Evans for Acrelane Timber Berkeley Group DP9 for The Collective Limited Coin Street Community Builders Maven Plan Union Jack Club
Elected politician	67	10	Cllr Jane Pickard Cllr Jon Davies Sian Berry AM Cllr Jackie Meldrum Knights Hill Ward Councillors Caroline Pidgeon AM Cllr Kevin Craig

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Lambeth Green Party
			Cllr Jennie Mosley
			Cllr Joanne Simpson
Faith group	147	3	St John's Church Waterloo
			Lambeth Methodist Circuit
			SPACNation Revival
Individuals	250	192	Names not published
Infrastructure provider	105	10	Openreach
			Wood PLC for National Grid
			Port of London Authority
			Guy's and St Thomas' NHS Foundation Trust
			Savills for Thames Water
			Pulse Smart Hub for Urban Innovation Company (UIC) Limited
			Nexus Planning for London Fire Commissioner
			NHS Lambeth Clinical Commissioning Group
			Network Rail

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Metropolitan Police Service
Neighbourhood Planning Forum	9	3	South Bank & Waterloo Neighbours
			Kennington Oval and Vauxhall Neighbourhood Forum
			Norwood Planning Assembly
Other London borough	14	6	City of London
			London Borough of Croydon
			London Borough of Wandsworth
			Royal Borough of Kensington and Chelsea
			Old Oak and Park Royal Development Corporation
			London Borough of Bromley
Other statutory consultee (including the GLA, HE, EA, NE)	136	7	Natural England
			Highways England
			Mayor of London
			Historic England
			Transport for London
			Department of Education

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Environment Agency
Representative body	53	11	London Travel Watch
			The Twentieth Century Society
			London Parks and Gardens Trust
			Home Builders' Federation
			London Community Land Trust
			Theatres Trust
			Sport England
			Lambeth Staying Healthy Partnership Board
			Twentieth Century Society
			Citizens UK
			Campaign for Real Ale
Tenants'/residents' association	150	5	Lambeth Estate Residents' Association
			Hatfield Gardens Communication Group
			Poynders Garden Residents Association
			Whitgift Estate TRA

Type of respondent	Number notified on planning policy consultation database at Regulation 18	Number of responses received at Reg 18 stage 2	Respondent to Reg 18 stage 2
			Holland Rise & Whitebeam Close TMO
<b>Total</b>	<b>1875</b>	<b>330</b>	

## Appendix 1 Schedule 2: Summary of key changes to the DRLLP made between Regulation 18 consultation in October 2018 and Regulation 19 Proposed Submission Version in January 2020

Changes were made to the text of the Draft Revised Lambeth Local Plan between the version made available for public consultation in October 2018 and the Proposed Submission Version January 2020 in response to the following:

- Comments made during the public consultation (see the Draft Revised Lambeth Local Plan October 2018 Consultation Report for full consideration and response to the comments received)
- Recommendations made through the Sustainability Appraisal
- Changes to the Draft London Plan (DLP) during the examination process and as a result of the recommendations in the examination panel report. The Mayor's Intend to Publish version of the Draft London Plan December 2019 included all of the main modifications recommended by the examination panel and accepted by the Mayor (all reference to the London Plan in this schedule refer to this version).
- Changes to the NPPF in February 2019 and ongoing updates to national Planning Practice Guidance; and changes to CIL Regulations
- General factual updates

The key changes made are summarised below, by section of the Plan:

### Section 1 - Introduction

- Factual updates

### Section 2 – Evidence base and issues

- Factual updates and clarification, including latest government data on carbon emissions in Lambeth

### Section 3 – Spatial strategy, vision and strategic objectives

- Factual updates, amended references to London Plan housing target, and amplification to reflect the council’s ambition on climate change
- Updated Key Diagram

### Section 4 – Delivering the vision and objectives

- Policy D4 – additions to the list of items for which planning obligations may be sought; clarification in supporting text of the approach to monitoring fees for planning obligations

### Section 5 - Housing

- Policy H1 – change to reflect updated London Plan housing target for Lambeth, and to include reference to forthcoming Site Allocations DPD and Design Code SPD
- Policy H2 – rewrite to align with the London Plan approach to affordable housing; and reinstatement of the requirement for payment in lieu of affordable housing on sites providing between 1 and 9 units, subject to viability.
- Policy H3 – removal of policy support for flat de-conversions or change of use from housing to nursery
- Policy H4 – amendment to dwelling size mix policy for low cost social rented homes to allow up to 30% 3bed+ units (rather than up to 35%)
- Policy H5 – clarification of external amenity space standards for non-self-contained accommodation; inclusion of clear requirement that communal amenity and play spaces should be accessible to all irrespective of tenure
- Policy H6 – reduction in the threshold for residential conversions from 150sqm to 130 sqm
- Policy H7 – amendment to wording on nominations agreements and Higher Education Providers to align with London Plan
- Policy H9 – clarification of minimum room sizes in HMOs
- Policy H11 – alignment with London Plan around tenure of replacement affordable housing
- Policy H12 – clarification of the sequential approach to affordable housing, covenant and clawback mechanism, approach to rents and lettings for DMR units, and approach to family sized dwellings in Build to Rent schemes

## Section 6 – Economic development, retail and town centre uses

- Policy ED1 – clarification of the approach to loss of office floorspace
- Policy ED2 – rewrite of the affordable workspace policy to clarify that it only applies to B1a offices above 1,000sqm in the required locations; the three approaches to securing affordable workspace; the relationship with the Fast Track approach in mixed use schemes; and to include reference to the Workspace topic paper and emerging Affordable Workspace SPD.
- Policy ED3 – clarification of uses permitted in KIBAs to align with London Plan
- Policy ED4 – alignment with wording in London Plan around non-designated industrial sites
- Policy ED6 – inclusion of references to the Low Line project along railway arches
- Policy ED7 – updated language on CAZ retail clusters to align with London Plan and reference to Lower Marsh/The Cut special policy area
- Policy ED14 – clarification of the approach to managing hotels in Vauxhall; inclusion of provision that hotels should not compromise delivery of C3 housing; requirement to provide facilities for business users.

## Section 7 – Social infrastructure

- Policy S3 – update to reflect latest PPG requiring planning for nursery, sixth form and SEN places in addition to primary and secondary school places

## Section 8 – Transport and communications

- Policies T1 and T4 – updated throughout to align with the final Lambeth Transport Strategy and implementation plan
- Policy T2 – insertion of references to the Lambeth Healthy Routes Plan
- Policy T3 – as above; clarification of requirements for cycle parking/Sheffield stands; and new requirement for cycle hire scheme membership
- Policy T5 – consideration of use of river for transport of construction material and waste
- Policy T7 – alignment with London Plan on non-residential parking standards
- Policy T8 – additional policy requirements for servicing and freight consolidation

## Section 9 – Environment and green infrastructure

- Policy EN1 – clarification and updating around use of planning obligations, roof spaces and multiple benefits of green infrastructure
- Policy EN4 – new policy requirement for minor residential developments (1-9 units) to achieve at least 19% reduction in on-site carbon emissions beyond 2013 Building Regulations Part L; and reference to forthcoming Future Homes Standard 2025 and further updates to Building Regulations
- Policy EN5 – clarification around assessment of surface water flooding
- Policy EN6 – inclusion of wording to align with Thames Water requirements for planning applications
- Policy EN7 – updates to align with latest DLP policy on waste

## Section 10 – Quality of the built environment

- Policy Q3 – additional references around violence reduction through design
- Policy Q5 – clarification to the approach to local character
- Policies Q6 and Q7 – additional requirements around climate change mitigation and adaptation through design of public realm and new buildings; reference to Healthy Streets
- Policy Q7 – wording changes to address Historic England comments
- Policy Q10 – clarification around assessment of proposed tree loss and provision of replacement trees; cross reference to Urban Greening Factor
- Policy Q11 – additional policy requirements on energy efficiency and climate change mitigation and adaptation in building alterations and extensions; minimum amenity space area in extensions; clarity about potential for extensions and conversions to delivery new homes
- Policy Q14 – rewrite to change the approach to development within the curtilage of existing buildings
- Policy Q18 – support added for retrofitting for energy efficiency within established conservation best practice; clarification around Heritage at Risk
- Policy Q19 – support added for proposals that reduce adverse impacts on the Westminster World Heritage Site
- Policies Q20 and Q21 – inclusion of reference to Heritage Statements
- Policy Q24 – updates to policy on River Thames
- Policy Q25 – clarification to policy on views

- Policy Q26 – rewrite of policy on tall buildings to clarify the approach both within and outside locations identified as appropriate, to address comments from GLA, Historic England and others

## Section 11 – Places and neighbourhoods

In addition to addressing consultation responses, further amendments to the PN policies had regard to/sought to incorporate:

- The town centre classifications set out in table A1.1 of Annex 1 to the DLP in relation to night-time economy, commercial growth potential and residential growth potential (relevant to Lambeth’s CAZ retail clusters, major and district town centres)
- Further updated and emerging evidence such as the Streatham Investment and Growth Strategy
- The Lambeth Transport Strategy (including the Healthy Route Network)
- Heritage assets at risk (at the request of Historic England)
- The position in emerging neighbourhood plans, particularly the draft South Bank and Waterloo neighbourhood plan which was made in December 2019

The standard format of the PN policies was been further revised in the introductory text with the following headings: context and local character; housing; economy and culture; community; transport and public realm; and environment. Specifically, a new housing section was added to the introductory text for each PN policy to clearly signal the housing growth potential for each area, based on the evidence and policy approach within the DRLLP PSV as a whole.

The maps for the PN policies were updated to show a spatial representation of the aspirations of each PN area and to reflect other proposed changes such as to town centre boundaries, KIBAs, Creative Enterprise Zone, creative business cluster, night-time economy management zone.

The proposed main further changes to the PN policies (and associated changes the Proposed Changes to the Policies Map document) were as follows:

- Waterloo and South Bank no longer identified as a metropolitan town centre. Instead, PN1 reflects the London Plan which extends the existing CAZ retail cluster to cover a wider area and renames it as the Waterloo CAZ retail cluster. Lower Marsh/The Cut/Leake Street Arches are identified as a Special Policy Area to protect the small units and independent retailing in this area. This is the position proposed by Lambeth and agreed with the Mayor during the London Plan examination.

- Additional policy wording added to PN1 Waterloo to clarify the aspirations for the extension to Jubilee Gardens and the potential development of one third of Hungerford car park. A change to the boundary of the Metropolitan Open Land (MOL) at Hungerford car park also included in the Proposed Changes to the Policies Map document (resulting in no net loss of area designated as MOL).
- Reference included in PN1 Waterloo to the Waterloo and South Bank Public Realm Framework, which is a guidance document.
- Policy PN3 Brixton includes further amendments to the approach to managing the mix of ground floor uses in the town centre, and a reference to the emerging Brixton Central Supplementary Planning Document. Minor changes to the boundary of the town centre and primary shopping area in central Brixton included in the Proposed Changes to the Policies Map document.
- Amendments to the boundary of Streatham town centre and the two primary shopping areas included in the Proposed Changes to the Policies Map document, reflecting the recommendations of the Streatham Investment and Growth Strategy. These changes were consulted on alongside the draft Investment and Growth Strategy during summer 2018.
- In Policy PN7, the name of the proposed West Norwood Creative Enterprise Zone (CEZ) was changed at the request of the Mayor of London. A reference was included to a future Supplementary Planning Document for Norwood High Street.
- An amendment to the boundary of the Primary Shopping Area (PSA) in West Norwood at site 18 was included in the Proposed Changes to the Policies Map document.
- The key development principles that had emerged through the partially completed Loughborough Junction masterplan were included in Policy PN10. The policy and introductory text were also amended to take account of comments submitted by the Loughborough Junction Action Group and neighbourhood forum.

#### Annexes

- 1 - Updated evidence base list
- 3 – Amendment to reflect the new Waterloo CAZ retail cluster
- 8 – Updated monitoring framework
- 10 – Updated list of charging approaches
- 11 - Amended maps identifying locations appropriate for tall buildings
- 13 - Revised housing trajectory reflecting the revised housing target and latest data; plus updated indicative housing delivery figures for designated neighbourhood planning areas

## Appendix 2

This appendix addresses the requirements of Regulation 22(1)(c)(v):

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations

### 1) Introduction

The Council published the Draft Revised Lambeth Local Plan Proposed Submission Version (DRLLP PSV) and associated Proposed Changes to the Policies Map on 31 January 2020, pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Pre-submission publication took place for six weeks until 13 March 2020. Section 2 of this Appendix, along with Schedule 1, sets out who was consulted and how that was undertaken.

85 respondents raised 464 comments under Regulation 20. A summary of the main issues raised in Plan order is contained in Section 3 of this Appendix, along with Schedule 2. This includes the response of the Council to the comments made.

Section 4 of this Appendix sets out a brief conclusion on the efficacy of the Regulation 19 publication process.

### 2) Who was consulted under Regulation 19 and how that was undertaken?

Upon publication on the Council's website, a formal notification email was sent to approximately 2,100 persons or organisations on the Council's planning policy consultation database (which includes the statutory, specific and general consultation bodies required by the Regulations and those wishing to be notified following Regulation 18 consultation) to invite them to make representations on the DRLLP PSV and associated Proposed Changes to the Policies Map. The email was also sent to approximately 7,000 other contacts on wider lists held by the Council, with follow-up reminders sent during the six week period.

The notification email included a link to the statement of representations procedure and to the Regulation 19 representation form (using the format recommended in the Planning Inspectorate's guidance on local plan examinations); as well as to the web-page that included the proposed submission documents and associated supporting documents (Sustainability Appraisal and non-technical summary, HRA screening assessment, evidence base, topic papers, reports on the consultation undertaken under Regulation 18, and statements of common ground with other planning authorities). The email also included a link to the concurrent consultation on the Draft Revised Lambeth CIL Charging Schedule.

The consultation was also publicised on the Council's consultation web-page, via social media and through a presentation to the South Bank Forum on 5 March 2020.

Stakeholders were advised they could submit representations using the on-line version of the form, or by post or email using the pdf version of the form provided.

Hard copies of the DRLLP PSV and Proposed Changes to the Policies Map, the Sustainability Appraisal, HRA screening assessment, statement of representations procedure and representations form were made available in all Lambeth libraries and at the Council's main offices, along with an explanation of how to access the other supporting documents by using a computer within a library.

In addition, in accordance with Section 24(4)(a) of the Planning and Compulsory Purchase Act 2004 and Regulation 21 of the 2012 Regulations, on 31 January 2020 (the first day of pre-submission publication) Lambeth requested the opinion in writing of the Mayor of London as to the general conformity of the Draft Revised Lambeth Local Plan Proposed Submission Version and associated Proposed Changes to the Policies Map (January 2020) with the Mayor's London Plan, which is the spatial development strategy for London. The Mayor responded on 13 March 2020.

Schedule 1 of this Appendix provides further details of who was notified of the publication/notification materials produced.

### 3) Main Issues raised in Plan order including the Council response/action

85 respondents raised 464 comments under Regulation 20. The breakdown by type of respondent is set out in Schedule 1 of this Appendix. Schedule 2 of this Appendix summarises the main issues raised by the Regulation 20 representations received in response to Regulation 19 publication. This is organised by DRLLP PSV section including comments on the Proposed Changes to the Policies Map and key evidence where relevant (e.g. Infrastructure Delivery Plan). Exceptionally the Council has considered the need for potential amendments to the proposed submission plan to clarify and improve its overall content. Where justified, this is explained within the table. A separate schedule of potential changes has been prepared (SD17), which has not been the subject of public consultation or sustainability appraisal. This schedule has been submitted in accordance with the approach set out in paragraph 1.5 of the Planning Inspectorate's Procedure Guide for Local Plan Examinations June 2019.

Copies of the representations received pursuant to Regulation 19/20 are available separately [here](#).

### 4) Conclusion

The summary above, in combination with Schedule 1 of this Appendix, explains which bodies and persons were invited to make representations under Regulation 19 and how in accordance with the plan-making Regulations and the approach set out on pages 16-17 of the Council's [Statement of Community Involvement 2015](#) (SD07). Section 3 above and Schedules 1 and 2 of this Appendix set out the number of representations made pursuant to regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

Appendix 2 Schedule 1 – Details of the consultation undertaken

A - Those notified and respondents to the Regulation 19 consultation

Type of respondent	Number notified on planning policy database	Number of representations received	Respondent unique ID number and name (including agent name where relevant)
Affordable housing provider	107	2	R043 – London and Quadrant Housing Trust
			R081 – RPS for Notting Hill Genesis
Business	64	4	R001 – Engineering Force (UK)
			R038 – Andrew Sissons Consulting
			R071 – SSA Planning for Kentucky Fried Chicken (Great Britain) Limited
			R079 – Acoustic Group Ltd
Business improvement district	12	1	R030 – WeAreWaterloo Business Improvement District
Community group	572	7	R028 – Loughborough Junction Action Group and Loughborough Junction Neighbourhood Forum
			R032 - Loughborough Junction Neighbourhood Forum
			R040 – Waterloo Community Development Group
			R045 – Friends of Jubilee Gardens
			R066 – The Brixton Society
			R074 – Jubilee Gardens Trust
			R083 – Friends of Lambeth Libraries
Developer/landowner	322	33	R010 – Quod for Southbank Centre
			R013 – Tulley Bunting for British Film Institute
			R018 – CBRE for Wolfe Commercial Properties Southbank Limited
			R019 – U and I Group PLC
			R029 – ROK Planning for UDN Redevelopments Ltd

Type of respondent	Number notified on planning policy database	Number of representations received	Respondent unique ID number and name (including agent name where relevant)
			R031 – Strutt and Parker for Marlin Apartments Ltd
			R035 – Savills for Bellway Homes Limited (London Partnerships) and Riverside Group
			R037 – CarneySweeney for Coin Street Community Builders
			R039 – Savills for Harrison Homes
			R041 – TfL Commercial Development
			R042 – Gerald Eve LLP for Kessler (SLR) Limited
			R044 – Indigo Planning for Espalier Ventures and MELT Property
			R046 – ROK Planning for Unite Students
			R047 – DP9 for PPHE Hotel Group
			R049 – ROK Planning for Waterloo Hub Hotel Limited
			R050 – ROK Planning for Southbank Hotel Management Company Limited
			R051 – Rolfe Judd Planning for Workspace Management Limited
			R053 – Savills for Guy's and St Thomas' Charity
			R055 – Turley for Arch Company Properties LP
			R057 – Avison Young for Connected Living London
			R059 – Turley for Alumno Group
			R060 – DP9 for HB Reavis UK Limited
			R061 – Turley for Olympian Homes
			R063 – RPS for Bywater Properties
			R064 – DP9 for Bourne Capital
			R067 – Gerald Eve LLP for Stanhope PLC
			R068 – JLL for Grainger plc
			R076 – DP9 for Hondo Enterprises

Type of respondent	Number notified on planning policy database	Number of representations received	Respondent unique ID number and name (including agent name where relevant)
			R077 – Barton Willmore for London Hotel Group
			R078 – Union 4 Planning for Caddick Development
			R080 – DP9 for MEC London Property 3
			R082 – RPS for Tucan Investments Ltd
			R085 - Avison Young (UK) Limited for unspecified developer
Elected politician	67	0	
Faith group	146	0	
Individual	297	6	R012 – Bolanle Ayekoti
			R014 – Crispin Royle-Davies
			R026 – James Burton
			R065 – Marilyn Evers
			R070 – H Armstrong
			R084 – Catherine James
Infrastructure provider	110	10	R004 – Western Riverside Waste Authority
			R005 – Avison Young for National Grid
			R016 – Savills for Thames Water Utilities Ltd
			R020 – Port of London Authority
			R024 – ID Planning for King's College Hospital Foundation Trust
			R036 – NHS London Healthy Urban Development Unit
			R052 – Nexus Planning for London Fire Commissioner
			R056 – Network Rail
			R058 – Lambert Smith Hampton for Metropolitan Police Service
			R069 – Guy's & St Thomas' NHS Foundation Trust
Neighbourhood Planning Forum	13	1	R027 – Norwood Action Group, Norwood Forum, Norwood Planning Assembly, Station to Station (West Norwood Business Improvement District), Crystal Palace & Upper Norwood Neighbourhood Forum

Type of respondent	Number notified on planning policy database	Number of representations received	Respondent unique ID number and name (including agent name where relevant)
Other London borough	13	3	R015 – London Borough of Bromley
			R034 – London Borough of Southwark
			R062 – London Borough of Croydon
Other statutory consultee (including the GLA, HE, EA, NE)	175	10	R002 – Gloucestershire County Council (Minerals and Waste Policy)
			R003 – Natural England
			R006 – Highways England
			R008 – Historic England
			R017 – Surrey County Council
			R022 – Historic England
			R033 – Department for Education
			R048 – Transport for London (TfL)
			R054 – Greater London Authority/Mayor of London
Representative body	60	6	R075 – Environment Agency
			R007 – Sport England
			R009 – London Parks & Gardens Trust
			R021 – Theatres Trust
			R023 – Home Builders Federation

Type of respondent	Number notified on planning policy database	Number of representations received	Respondent unique ID number and name (including agent name where relevant)
			R072 – South Bank Employers' Group
			R073 – United Cabbies Group
Tenants'/residents' association	152	2	R011 – Bleinham Gardens Residents' Management Organisation
			R025 – Stockwell Park Residents' Association
<b>Total</b>	<b>2110</b>	<b>85</b>	

## B – Notification materials

- Notification email
- Statement of representations procedure
- Pdf of representation form
- Letter/explanatory note for libraries
- Screenshots of webpages

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**From:** Consultation and Engagement team – Lambeth Council  
[<mailto:engagement@email.lambeth.gov.uk>]  
**Sent:** 31 January 2020 14:56  
**To:**  
**Subject:** Consultation: Draft Revised Lambeth Local Plan Proposed Submission

[Click to view in your browser](#)



Hello,

Following approval by Lambeth Council, the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 and associated Proposed Changes to Policies Map January 2020 (DRLLP PSV and associated PCPM Jan 2020) 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.

The six-week publication period is from Friday 31 January to Friday 13 March 2020.

Representations must be received by **11pm on Friday 13 March 2020**.

The proposed submission documents listed below are [available here](#)

- Draft Revised Lambeth Local Plan Proposed Submission Version January 2020
- Proposed Changes to the Policies Map January 2020
- Sustainability Appraisal
- Sustainability Appraisal non-technical summary
- Habitats Regulations Screening Assessment

In addition, the proposed submission documents are available for inspection during the six week period at all Lambeth libraries and the Lambeth Town Hall reception (see the attached statement of representations procedure for details of locations).

Visit our website for [additional information](#) about previous consultations on these documents, supporting evidence and how Lambeth has co-operated with other organisations.

You now have the opportunity to submit representations on the DRLLP PSV and associated PCPM Jan 2020. The scope for representations at Regulation 19 pre-submission publication is limited to the legal compliance and soundness of the draft

plan and should be made in one of the three following ways:

- online via [the online representation form](#)
- by email to [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)
- in hard copy by post to Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG

You can [download a PDF version of the representation form](#). For further information about how to submit your representation please [read the Statement of Representations Procedure](#) and the Guidance Notes on the form. Please ensure you read the notes provided about the use of your information and privacy.

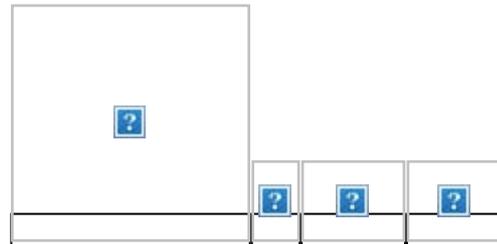
After publication the council will submit the DRLLP PSV and associated PCPM Jan 2020 plus the representations received to the Secretary of State for independent examination. Information about the examination will be available on the council's website in due course.

You will also receive an email about the Council's simultaneous publication of [Lambeth's Draft Community Infrastructure Levy Charging Schedule](#).

If you have any questions regarding this email, and/or you no longer wish to receive communications of this nature, please email [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

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Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit [subscriberhelp.govdelivery.com](http://subscriberhelp.govdelivery.com).

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This email was sent to [ehsan.a@engineeringforce.co.uk](mailto:ehsan.a@engineeringforce.co.uk) using GovDelivery Communications Cloud on behalf of: Lambeth Council · Lambeth Town Hall, 1 Brixton Hill, Brixton, London, SW2 1RW



Receive Updates



# Consultation: Draft Revised Lambeth Local Plan Proposed Submission

[Click to view in your browser](#)



Hello,

Following approval by Lambeth Council, the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 and associated Proposed Changes to Policies Map January 2020 (DRLLP PSV and associated PCPM Jan 2020) 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.

The six-week publication period is from Friday 31 January to Friday 13 March 2020.

Representations must be received by **11pm on Friday 13 March 2020**.

The proposed submission documents listed below are [available here](#)

- Draft Revised Lambeth Local Plan Proposed Submission Version January 2020
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- Sustainability Appraisal
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In addition, the proposed submission documents are available for inspection during the six week period at all Lambeth libraries and the Lambeth Town Hall reception (see the attached statement of representations procedure for details of locations).

Visit our website for [additional information](#) about previous consultations on these documents, supporting evidence and how Lambeth has co-operated with other organisations.

You now have the opportunity to submit representations on the DRLLP PSV and associated PCPM Jan 2020. The scope for representations at Regulation 19 pre-submission publication is limited to the legal compliance and soundness of the draft plan and should be made in one of the three following ways:

- online via [the online representation form](#)
- by email to [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)
- in hard copy by post to Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG

You can [download a PDF version of the representation form](#). For further information about how to submit your representation please [read the Statement of Representations Procedure](#) and the Guidance Notes on the form. Please ensure you read the notes provided about the use of your information and privacy.

After publication the council will submit the DRLLP PSV and associated PCPM Jan 2020 plus the representations received to the Secretary of State for independent examination. Information about the examination will be available on the council's website in due course.

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Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit [subscriberhelp.govdelivery.com](http://subscriberhelp.govdelivery.com).

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## Statement of Representations Procedure

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The London Borough of Lambeth plans to submit the Draft Revised Lambeth Local Plan Proposed Submission Version and associated Proposed Changes to the Policies Map (January 2020) (DRLLP PSV and associated PCPM Jan 2020) to the Secretary of State for Housing, Communities and Local Government. The submission documents are being published prior to submission in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

**Title of document:** Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 and associated Proposed Changes to the Policies Map January 2020.

**Subject matter and area covered:** The Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 sets out partially revised planning policies for the London Borough of Lambeth to guide growth in housing and jobs, infrastructure delivery, place-shaping and the quality of the built environment over the next 15 years. The associated Proposed Changes to the Policies Map January 2020 sets out proposed changes to planning policy designations on the Lambeth Policies Map. Once adopted, these documents will replace the Lambeth Local Plan 2015 and the Policies Map 2015.

The Lambeth Local Plan is part of the statutory development plan for Lambeth, alongside the Mayor of London's London Plan and the South Bank and Waterloo Neighbourhood Plan. Together these documents set the policy context for growth and development in the borough and provide the basis for determining planning applications.

**Period within which representations must be made:** Representations can be made over a six-week period, beginning Friday 31<sup>st</sup> January 2020. Representations should arrive back to the council no later than 11pm on Friday 13<sup>th</sup> March 2020.

**Representations can be submitted in one of the three following ways:**

**online** via the [online representation form](#)

**send representation form by email** to [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

**send representation form in hard copy by post** to Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG

Please note:

Representations may be accompanied by a request to be notified at a specified address of any of the following:

- (a) that the DRLLP PSV and associated PCPM Jan 2020 has been submitted for independent examination
- (b) the publication of the inspector's recommendations following the independent examination
- (c) the adoption of the Revised Local Plan and Policies Map.

If you do require this notification, please remember to specify this on the representation form and provide your contact address.

### **How to view the proposed submission documents**

All proposed submission documents, including background papers and the sustainability appraisal, are available to view on London Borough of Lambeth's website at:

<http://www.lambeth.gov.uk/planning/localplanreviewproposedsubmission>

The online representation form, a PDF version for printing, guidance notes on how to complete the form and information about Privacy can also be found on this page

Alternatively, hard copies of the DRLLP PSV and associated PCPM Jan 2020, Sustainability Appraisal and its non-technical summary and Habitats Regulation Screening Assessment can be viewed during the six week publication period in all Lambeth libraries or on request at Lambeth Town Hall reception. Printed representation forms are also available from these locations, along with the guidance notes about how to complete the form and information about Privacy.

Please see below the list of addresses where you can view the documents.

**Lambeth Town Hall**, Brixton Hill, London SW2 1RW (Monday to Friday 9.30am – 4.30pm)

**Brixton Library**, Brixton Oval, London SW2 1JQ (Monday 1pm-8pm, Tuesday 10am-8pm, Wednesday 10am-6pm, Thursday 10am-8pm, Friday 10am-6pm, Saturday 9am-5pm, Sunday 12noon-5pm)

**Carnegie Library**, 192 Herne Hill Road, London SE24 0AG (Monday 2pm-7pm, Tuesday & Thursday 10am-1pm, 2pm-7pm, Wednesday & Friday 10am-1pm, 2pm-6pm, Saturday - 10am-1pm, 2pm-5pm)

**Clapham Library**, Mary Seacole Centre, 91 Clapham High Street, London SW4 7DB (Monday 1pm-8pm, Tuesday & Friday 10am-6pm, Wednesday and Thursday 10am-8pm, Saturday 9am-5pm, Sunday 1pm – 5pm)

**Durning Library**, 167 Kennington Lane, London SE11 4HF (Monday 1pm-6pm, Tuesday & Friday 10am-6pm, Wednesday 10am-8pm, Saturday 9am-5pm)

**Minet Library**, 52 Knatchbull Road, London SE5 9QY (Monday 1pm-8pm, Tuesday and Thursday 10am-6pm, Friday 10am-3pm, Saturday 9am-1pm, 2pm -5pm)

**Tate South Lambeth Library**, 180 South Lambeth Road, London SW8 1QP (Monday 1pm-6pm, Wednesday & Friday 10am-6pm, Thursday 10am-8pm, Saturday 9am-5pm)

**Streatham Library**, 63 Streatham High Road, London SW16 1PN (Monday 1pm-8pm, Tuesday & Wednesday 10am-8pm, Thursday & Friday 10am-6pm, Saturday 9am-5pm, Sunday 12noon-5pm)

**Waterloo Library**, Oasis Centre 1 Kennington Road, London SE1 7QP (Monday-Friday 8am-6pm, Saturday 9.30am-3.30pm)

**West Norwood Library**, 1-5 Norwood High Street, London SE27 9JX (Monday 1pm-8pm, Tuesday & Thursday 10am-8pm, Wednesday & Friday 10am-6pm, Saturday 10am-6pm, Sunday 1pm-5pm)

**Upper Norwood Joint Library**, 39 Westow Hill, London, SE19 1TJ (Tuesday, Wednesday, Friday and Saturday 10am-6pm, Thursday 10am-8pm, Sunday 11am-5pm)

For further information please email [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

# Pre-Submission Publication Representation Form



Ref:
(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](mailto:localplan@lambeth.gov.uk)

or by post: Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG  
by 11pm on 13<sup>th</sup> March 2020.

**Please read the Guidance Note and Privacy Notice attached to this form before completing the representation form or submitting your comments**

This form has two parts –

Part A – Personal details (please see applicable privacy notices in Section 5 of the guidance note)

Part B – Your representation(s). Please fill in a separate sheet for each part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you wish to make a representation about.

## Part A

### 1. Personal details\*

### 2. Agent's details (if applicable)

\* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	<input type="text"/>	<input type="text"/>
First name	<input type="text"/>	<input type="text"/>
Last name	<input type="text"/>	<input type="text"/>
Job title <sup>†</sup>	<input type="text"/>	<input type="text"/>
Organisation <sup>†</sup>	<input type="text"/>	<input type="text"/>
Address	<input type="text"/>	<input type="text"/>
	<input type="text"/>	<input type="text"/>
	<input type="text"/>	<input type="text"/>
	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone	<input type="text"/>	<input type="text"/>
Email <sup>†</sup>	<input type="text"/>	<input type="text"/>

<sup>†</sup> 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<sup>^</sup>**

Yes

No

**4.3 Complies with the Duty to co-operate**

Yes

No

<sup>^</sup> *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.**

# 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.

*(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:

*(if required continue on the additional comments page attached)*

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

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

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

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

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

Signature

Date

*Please use this section for any additional/continued comments*

# **Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (Regulation 19) Guidance Note**

**Please read this guidance note before completing the representation form or submitting your comments**

## **1. Introduction**

- 1.1. The 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) has been published by Lambeth Council in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The Planning and Compulsory Purchase Act 2004, as amended, [PCPA] states that the purpose of the examination is to consider whether the draft plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the draft plan that are made within the publication period 31<sup>st</sup> January – 13<sup>th</sup> March 2020.
- 1.2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the draft plan. Lambeth Council will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector.

## **2. Legal Compliance and Duty to Co-operate**

- 2.1. You should consider the following before making a representation on legal compliance:
  - The DRLLP PSV Jan 2020 and associated PCPM Jan 2020 should be included in Lambeth's current Local Development Scheme [LDS] and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by Lambeth Council, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which Lambeth Council proposes to bring forward for examination. If the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 is not in the current LDS it should not have been published for representations. The LDS should be on the Lambeth's website and available at its main offices.
  - The process of community involvement for the draft plan in question should be in general accordance with the Lambeth's Statement of Community Involvement 2015 [SCI]. The SCI sets out the Lambeth's strategy for involving the community in the preparation and revision of plans and the consideration of planning applications.
  - Lambeth Council is required to provide a Sustainability Appraisal [SA] report when it publishes a draft plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the draft plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
  - In London, the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 should be in general conformity with the London Plan. In this case this is the Draft London Plan Intend to Publish version December 2019.

- The DRLLP PSV Jan 2020 and associated PCPM Jan 2020 should comply with all other relevant requirements of the PCPA and the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended [the Regulations].

2.2. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires Lambeth Council to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. Evidence of this activity is provided in the Statements of Common Ground published on the council website [www.lambeth.gov.uk/planning/localplanreviewproposedsubmission](http://www.lambeth.gov.uk/planning/localplanreviewproposedsubmission)
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

### 3. Soundness

3.1. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- 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;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- 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
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

3.2. If you think the content of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy or the London Plan?
- Is the issue with which you are concerned already covered by another policy in the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?
- If the policy is not covered elsewhere, in what way is the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 unsound without the policy?
- If the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 is unsound without the policy, what should the policy say?

#### **4. General advice**

- 4.1. If you wish to make a representation seeking a modification to the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 or part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you should set out clearly in what way you consider the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 or part of either is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 3.1 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.
- 4.2. You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.
- 4.3. Where groups or individuals share a common view on the DRLLP PSV Jan 2020 and associated PCPM Jan 2020, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.4. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

#### **5. Privacy notice**

- 5.1 Lambeth Council's privacy notice can be found at <https://www.lambeth.gov.uk/elections-and-council/privacy/privacy-notice> and its planning service privacy notice is here: <https://www.lambeth.gov.uk/elections-and-council/privacy/planning-transport-and-development-service-privacy-notice> . Representations received will be sent to the Planning Inspector. The Planning Inspectorate privacy notice is [here](#). It is very important that you read and consider these notices carefully because they explain how your personal information will be used and stored.

## **Inspector Privacy Statement June 2019**

This privacy notice provides information about our processing of personal information on Local Plan and Community Infrastructure Levy (CIL) examinations in England.

Our published *Procedure Guide for Local Plan Examinations* provides detailed information about the plans process. It can be found here:

<https://www.gov.uk/guidance/local-plans>

### **Who are we?**

We are the Planning Inspectorate, an agency sponsored by the Ministry of Housing, Communities and Local Government.

Our Inspectors are appointed by the Secretary of State for Housing, Communities and Local Government to carry out an independent examination of local plans which have been submitted. For CILs, our Inspectors are appointed by the charging authority to examine their Charging Schedule.

### **How do we collect information?**

Local authorities submit information to us in respect of their proposed plan and CIL– including the representations that they received on it. This information is sent to the Inspector.

During the examination, the Inspector will also hear oral representations from the parties and consider any further written representations that are accepted during that examination.

The local planning authority will provide a programme officer to support the Inspector, and representations are exchanged between the local authority and the Inspector through the programme officer

### **What type of information do we collect?**

Typically, the personal information will be your name, address and contact details plus any other personal information (if any) that you provide in your representation.

### **How is that information used?**

The Inspector will examine the information submitted and will provide a report to the local planning authority setting out their recommendations.

Those participating in a Local Plan and CIL should note that the representations they provide in respect of an examination are normally required to be made available and/or published by the local planning authority. The local planning authority is also required to publish the Inspector's report.

### **What is the legal basis for our processing of information?**

Our processing of personal information on plans and CIL casework is necessary for the performance of a task carried out in the public interest. There are also explicit statutory/legal obligations that underpin the examination of plans and CIL casework.

Our processing of any special category data (if any is provided) is on a similar basis, being necessary for reasons of the substantial public interest in exercise of our official function of administering and determining cases.

### **What are the consequences of failing to provide your information?**

There is no statutory obligation on an interested party to participate in a case.

### **How long do we keep your information?**

We normally keep the documents submitted on the plan and CIL for a period of approximately 3 months following the local planning authority's decision as to whether they adopt their proposed plan.

We keep the Inspector's report for approximately 5 years.

### **Who do we share information with?**

As set out above and in our casework guidance, representations received on the plan and CIL are exchanged with the local planning authority through the programme officer, and are made publicly available by the local planning authority. We may also provide information to our sponsor department.

We may use third party service providers to assist us in the provision of our service – for instance through the provision of information technology services. Where we do so, contracts will be put in place to ensure that your personal information is processed only as instructed by us (unless otherwise required by law), and that appropriate measures are in place to ensure the security of information.

### **Transfer of information overseas**

We do not transfer your information outside of the EU.

### **Your rights in respect of your personal information**

Data protection legislation provides you with rights in respect of your personal information. Typically these are:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability
- the right to object;
- rights in relation to automated decision making and profiling.

Given our lawful basis for processing information, your rights to erasure, data portability and to object to the processing of your information may not apply and we do not use automated decision making or profiling.

Your other rights may also not be absolute and, as our legal basis for processing information is not normally dependent on your consent, withdrawal of this is not normally applicable. However, if you have concerns over the use of your personal information, or wish to exercise your rights, then please contact us at the address below.

### **Complaints about the processing of your personal information**

When we process your personal information we will comply with the Data Protection Act.

If you are unhappy with the way the Inspectorate processes your personal information then you should first contact the Inspectorate's Data Manager: [dataprotection@planninginspectorate.gov.uk](mailto:dataprotection@planninginspectorate.gov.uk).

Data Manager The Planning Inspectorate 3<sup>rd</sup> Floor Temple Quay House 2 The Square, Temple Quay Bristol BS1 6PN

Alternatively, you can contact our respective sponsor's Data Protection Officer directly (please make clear that your query/complaint relates to the Planning Inspectorate)

MPCLG: [dataprotection@communities.gov.uk](mailto:dataprotection@communities.gov.uk)

If you are still not happy, or for independent advice about data protection, privacy and data sharing, you can contact:

The Information Commissioner's Office Wycliffe House Water Lane Wilmslow,  
Cheshire, SK9 5AF Telephone: 0303 123 1113 or 01625 545 745

<https://ico.org.uk/>

### **Changes to this privacy notice**

We keep our privacy policy under review. This privacy policy was last updated on 3 June 2019.

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«Address\_1»  
«Address\_2»  
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January 2020

Dear Library Manager

## **PLANNING POLICY DOCUMENTS FOR PUBLIC INSPECTION**

You should have received with this letter the following documents:

- Draft Revised Lambeth Local Plan Proposed Submission Version January 2020
- Proposed Changes to the Policies Map January 2020
- Sustainability Appraisal (plus two appendices)\*
- Sustainability Appraisal: non-technical summary
- Habitat Regulations Screening Assessment
- Pre-submission publication representation form, including Guidance Note and Planning Inspectorate privacy notice
- Statement of representations procedure

In accordance with national legislation please could you put these documents out on display available for public view in your library for six weeks between Friday 31<sup>st</sup> January 2020 and 13<sup>th</sup> March 2020. This is the statutory six-week pre-submission publication period for these documents.

Enclosed is one copy of the documents, with 25 representation forms and two copies of the statement of representations procedure also provided. The statement of representations procedure explains how members of the public can submit comments on the documents.

\* Please note: The Sustainability Appraisal has seven appendices in total but due to their size I have only provided printed copies of Appendices 1 and 2. Appendices 3 to 7 can be found on the council's website at <https://www.lambeth.gov.uk/planning-and-building-control/planning-policy/local-plan-review-sustainability-appraisal>.

In addition, all the proposed submission documents plus further background papers, consultation report, pre-submission publication representations form, privacy notices and more information on planning policy are also available to view on the London Borough of Lambeth's website:  
<http://www.lambeth.gov.uk/planning/localplanreviewproposedsubmission>.

If requested, please could library staff assist customers to view these additional documents online?

If you have any questions regarding this letter, or require additional copies of any document please email me on [VRodgers@lambeth.gov.uk](mailto:VRodgers@lambeth.gov.uk).

Yours sincerely

Vanessa Rodgers  
Principal Planner (Policy)  
London Borough of Lambeth  
Civic Centre 3<sup>rd</sup> Floor  
London SW2 1RW  
Email: [VRodgers@lambeth.gov.uk](mailto:VRodgers@lambeth.gov.uk)



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# Draft revised Lambeth Local Plan - proposed submission version January 2020 evidence base

## Sections in this guide (click title to view)

### 1. Topic papers

### 2. Socio-economic Data

### 3. Housing

### 4. Business and Jobs

### 5. Town Centre Uses and Hotels

### 6. Transport

### 7. Environment (including Air Quality, Waste and Green Infrastructure)

### 8. Quality of the Built Environment

### 9. Places and Neighbourhoods

### 10. Viability

### 11. Infrastructure

Feedback

## 1. Topic papers

Topic papers provide an overview of the policy approach and evidence for the following topics:

- [Topic Paper 1: Affordable housing on sites providing fewer than 10 residential units](#) 
- [Topic Paper 2: Housing delivery on small sites](#) 
- [Topic Paper 3: Workspace](#) 
- [Topic Paper 4: Town centres](#) 

- [Topic Paper 5: Visitor accommodation](#) 
- [Topic Paper 6: Parking standards](#) 
- [Topic Paper 7: Climate change](#) 
- [Topic Paper 8: Tall buildings](#) 

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## Statements of common ground

A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters.

These following Statements of Common Ground have been prepared to demonstrate that Lambeth's Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV 2020) is 'based on effective joint working on cross-boundary strategic matters', in accordance with the requirements of paragraph 35 of the National Planning Policy Framework (NPPF).

The first set of Statements are between Lambeth and its neighbouring boroughs.

- [Statement of Common Ground between London Borough of Lambeth and the City of London December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth and the City of Westminster December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Bromley December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Croydon December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth, London Borough of Bromley and London Borough of Croydon December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Merton December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Southwark December 2019](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Wandsworth December 2019](#) 

The second set of Statements are between Lambeth and waste planning authorities that receive 'strategic' amounts of waste exports from Lambeth. A 'strategic' amount of waste is that over certain thresholds which have been agreed by waste planning authorities across the wider south east.

- [Statement of Common Ground between London Borough of Lambeth and London Borough of Bexley covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Cambridgeshire County Council and Peterborough City Council](#) 
- [Statement of Common Ground between London Borough of Lambeth and Essex County Council covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Royal Borough of Greenwich covering strategic waste matters](#) 

- [Statement of Common Ground between London Borough of Lambeth and London Borough of Havering covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Hertfordshire County Council covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Hillingdon covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Kent County Council covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Medway Council covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Old Oak and Park Royal Development Corporation covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and London Borough of Newham covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Reading Borough Council covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and the South London Waste Plan Boroughs covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Surrey County Council covering strategic waste matters](#) 
- [Statement of Common Ground between London Borough of Lambeth and Thurrock Council covering strategic waste matters](#) 

These statements were agreed by Lambeth through a [Cabinet member decision](#)  in December 2019.

Last updated on Friday 17 April 2020

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## Local Plan Review - Sustainability appraisal

Planning legislation requires the council to carry out a sustainability appraisal for the Local Plan Review.

The Sustainability Appraisal will take place in stages as the Local Plan Review goes through the process of preparation and at each stage there is an opportunity to comment on the Sustainability Appraisal. It will test the proposed Local Plan against environment, economic and social objectives. It also considers the impact of proposed policies on protected characteristics and health and well-being.

The Sustainability Appraisal will consider the ways in which the Local Plan Review can contribute to improvements in environmental, social and economic conditions, and is also a way of identifying and mitigating any potential adverse impacts. The Sustainability Appraisal also makes sure that the proposals in the Local Plan Review are the most appropriate, given the reasonable alternatives.

### Sustainability appraisal scoping report August 2016

The [Scoping Report](#) examined the sustainability issues in Lambeth. The issues identified in the Scoping Report were used to produce a Sustainability Appraisal framework against which the Local Plan Review can be measured. Comments on the Scoping Report were sought and received from the three statutory bodies: Historic England, Natural England and the Environment Agency. The Scoping Report was updated in response to their comments.

### Sustainability appraisal of Local Plan Review issues and reasonable alternatives October 2017

The [Sustainability Appraisal](#) at this stage appraised the different possible ways (reasonable alternatives) identified to address the key issues for the Local Plan Review. The Sustainability Appraisal appraised the reasonable alternatives against the sustainability objectives that were developed as part of the Scoping Report process. Comments on the Sustainability Appraisal were sought during the Issues consultation 2017.

### Sustainability appraisal of Draft Revised Lambeth Local Plan October 2018

The [Sustainability Appraisal of the Draft Revised Lambeth Local Plan](#) appraises the proposed policies to inform the decision-making process by highlighting the potential implications of pursuing a particular strategy or policy approach. Where appropriate, it includes recommendations to reduce adverse effects and maximise beneficial effects. The Sustainability Appraisal was available for comment alongside the [Draft Revised Lambeth Local Plan](#) between 22 October and 17 December 2018.



# Sustainability appraisal of Draft Revised Lambeth Local Plan Proposed Submission Version 2020

The [Sustainability Appraisal of the Draft Revised Lambeth Local Plan Proposed Submission Version 2020](#) (DRLLP PSV 2020) appraises the proposed policies to inform the decision-making process by highlighting the potential implications of pursuing a particular strategy or policy approach. [Recommendations](#) arising from this appraisal to reduce adverse effects and maximise beneficial effects have been incorporated into the DRLLP PSV 2020. The [Sustainability Appraisal](#) is being published alongside the DRLLP PSV 2020 between 31st January and 13th March 2020. A [non-technical summary](#) of the SA on the DRLLP PSV 2020 is available.

## Habitat Regulations Assessment - screening assessment

Under European legislation, Lambeth Council is required to undertake a Habitat Regulations Assessment (HRA) on all local development planning documents and projects. The purpose of the HRA is to ensure that the protection of the integrity of European sites is part of the planning process. This [screening assessment](#) on the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 has not identified any likely significant adverse effects on any European Site nor any adverse impact on the integrity of sites. Therefore, the Appropriate Assessment stage is not required on the DRLLP PSV 2020.

Attachment	Size
<a href="#">Sustainability Appraisal Issues and Reasonable Alternatives - October 2017</a>	1.51 MB
<a href="#">Initial Habitat Screening Assessment on Draft Revised Lambeth Local Plan October 2018</a>	332.91 KB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan October 2018</a>	3.92 MB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020</a>	4.21 MB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 1</a>	695.16 KB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 2</a>	1.66 MB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 3</a>	761.27 KB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 3.1</a>	712.84 KB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 3.2</a>	3 MB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 3.3</a>	293.7 KB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 4</a>	2.61 MB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 5</a>	170.68 KB
<a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 6</a>	357.34 KB

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Attachment	Size
 <a href="#">Sustainability Appraisal - Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Appendix 7</a>	366.07 KB
 <a href="#">Sustainability Appraisal – Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 - Non technical summary</a>	511.33 KB
 <a href="#">Habitat Regulations Assessment – Draft Revised Lambeth Local Plan Proposed Submission Version January 2020</a>	371.65 KB

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# Pre-submission publication of the Draft Revised Lambeth Local Plan

This page provides information about pre-submission publication of the Draft Revised Lambeth Local Plan.

The Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 and associated Proposed Changes to the Policies Map January 2020 (DRLLP PSV and associated PCPM Jan 2020) are being published prior to submission for independent examination, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

**Pre-submission publication will take place between 31 January and 13 March 2020.**

Lambeth is also reviewing its Community Infrastructure Levy Draft Charging Schedule. Visit the [Lambeth's Community Infrastructure Levy Draft Charging Schedule](#)  for more information.

Lambeth is also consulting on two draft Supplementary Planning Documents (SPDs): [Affordable workspace SPD](#)  and [Design Code SPD](#) . These draft SPDs set out further guidance to policies in the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020.

## Sections in this guide (click title to view)

1. Proposed submission documents

2. How to provide comments

## 2. How to provide comments

You now have the opportunity to submit representations on the DRLLP PSV and associated PCPM Jan 2020. The scope for representations at Regulation 19 pre-submission publication is limited to the legal compliance and soundness of the draft plan.

For further information about how to submit your representation please read the attached [Statement of Representations Procedure](#) and the Guidance Notes on the form. Please ensure you read the notes provided below about the use of your information and privacy.

Please submit your comments by 11pm on Friday 13 March 2020.

You can submit your representation in one of the three following ways:

- online via:



[Submit your representation via an online form](#) .  
We recommend use of the following browsers: Google Chrome and Firefox

- [Download a representation form](#). Send your form by email to:



[localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

- [Download a representation form](#). Send your hard copy by post to:



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

## Privacy

Representations received will be sent to the Planning Inspector. Visit the [Planning Inspectorate privacy notice](#) for more information.

Find out more about [Lambeth Council planning service privacy notice](#) and [Lambeth Council's privacy notice](#) .

It is very important that you read and consider these notices carefully because they explain how your personal information will be used and stored.

## Contact us

If you have any questions, please email us at [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

## Related pages

- [Lambeth's local plan - guide](#)
- [Draft London Plan - Intend to Publish version](#)
- [Community Infrastructure Levy \(CIL\) - guide](#)



- [Supplementary Planning Documents and other policy guidance](#)
- [Neighbourhood planning - guide](#)
- [Lambeth Local Development Scheme \(LDS\)](#)
- [Statement of Community Involvement \(SCI\)](#)
- [Planning policy monitoring](#)

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# Pre-submission publication of the Draft Revised Lambeth Local Plan

This page provides information about pre-submission publication of the Draft Revised Lambeth Local Plan.

The Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 and associated Proposed Changes to the Policies Map January 2020 (DRLLP PSV and associated PCPM Jan 2020) are being published prior to submission for independent examination, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

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## Sections in this guide (click title to view)

### 1. Proposed submission documents

### 2. How to provide comments

## 1. Proposed submission documents

- [Draft Revised Lambeth Local Plan Proposed Submission Version January 2020](#)
- [Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 ERRATUM NOTICE](#) 
- [Proposed changes to the Policies Map January 2020](#)
- [Sustainability Appraisal](#) 
- [Non-technical summary Sustainability Appraisal](#)



- [Habitat Regulations Screening Assessment](#)
- [Evidence base](#) 
- [Statements of common ground](#)
- Information on Consultation to date ([Consultation report 2017](#), [Consultation report 2018 Part One](#) and [Consultation report 2018 Part Two](#))

## Related pages

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- [Lambeth's local plan - guide](#)
- [Draft London Plan - Intend to Publish version](#)
- [Community Infrastructure Levy \(CIL\) - guide](#)
- [Supplementary Planning Documents and other policy guidance](#)
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Appendix 2 Schedule 2: Summary of the main issues raised by the Regulation 20 representations and Council response, in Plan order

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
Section 1: Introduction					
Paras 1.23 – 1.27	These paragraphs are unsound because they are not effective. They should specifically refer to infrastructure provision and how cross boundary effective delivery is to occur.	Statements of Common Ground have been prepared with all neighbouring boroughs. Details of infrastructure provision, including green infrastructure are set out in the Infrastructure Delivery Plan (EB100) and will also be delivered through borough-wide policies such as EN1.	No	R037	Coin Street Community Builders
Paragraph 1.27	TfL is not actively progressing the extension of the Tram network to Crystal Palace as it is unlikely to be good value for money. TfL would suggest the removal of this scheme from the list of transport infrastructure projects.	We acknowledge that TfL is not actively pursuing the extension of the Tram network to Crystal Palace, but this remains an aspiration for the council and has been included at the request of the LB Croydon. Reference amended to reflect a degree of uncertainty. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
Section 2: Evidence base and issues					
Paragraph 2.38	Support for increasing step-free access at stations through developer contributions could be mentioned in this paragraph, in particular at key interchanges such as Waterloo where only the London Underground platforms are (partially) step free.	Noted, but reference to developer contributions not appropriate in this section of the Plan. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
Paragraph 2.40	Add references to Blackfriars and the Crossrail 2.	Accepted – references can be added. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
Paragraph 2.116	The paragraph is unsound because it is not positively prepared. Although youth provision is among the examples of community facilities identified in this paragraph, there is no specific provision or allocation identified for the Waterloo & South Bank. A significant youth facility, cross-subsidised by commercial income, should be identified in the Plan.	This section of plan does not set policy or identify place specific needs. Policies covering community facilities including youth facilities are covered in section 7 and the Infrastructure Delivery Plan (EB100). Place-specific issues needs are identified in relevant PN policies.	No	R037	Coin Street Community Builders
Paras 2.124 and 2.132	The paragraph is unsound because it is not effective. Neither of the paragraphs mention libraries.	Section 2 summarises issues, evidence and context. A reference to libraries can be added to paragraph 2.124 but the context of paragraph 2.132 is different.	Yes	R083	Friends of Lambeth Libraries
<b>Section 3: Spatial Strategy, Vision and Strategic Objectives</b>					
Paragraph 3.6	Not consistent with national policy because it does not plan for libraries to meet population growth in the plan period.	The Infrastructure Delivery Plan (EB100) sets out the position on libraries over the plan period.	No	R083	Friends of Lambeth Libraries
Paragraph 3.8	Unsound because not positively prepared. While the paragraph acknowledges the need for more open space, assessment of objective needs and exploration with other authorities and bodies such as Thames Water, about the potential re-purposing of sites as new public parkland has not been attempted or considered.	Policy EN1 provides the strongest possible protection for open space. The policy also requires major development in areas of open space deficiency and/or in areas of access to nature deficiency to provide new on-site open space/access to nature improvements. Thames Water has not contacted the council about potential for its land to be re-purposed as open space.	No	R011	Blenheim Gardens Residents' Management Organisation

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
Section 4: Delivering the Vision and Objectives					
D2	Include a requirement for applicants to submit a health and well-being impact assessment with larger planning applications.	Lambeth planning fully acknowledges the importance of health and well-being as a consideration in the development process and this is recognised through-out the DRLLP PSV. The plan's policies have undergone a rigorous and iterative health and well-being impact assessment as part of the Sustainability Appraisal. Therefore, when the policies in the plan are applied in decision-making, they already incorporate consideration of health and well-being impacts. Policy H11 specifically requires consideration of health and well-being. However, it is onerous systematically to require planning applications to be accompanied by health and well-being impact assessments, as this will place an undue burden on applicants and the planning service in assessing applications.	No	R036	HUDU for CCG
D3	The revised CIL Regulations remove pooling restrictions on use of s106 funds so they can be used to deliver infrastructure alongside CIL.	Section (c) can be amended to acknowledge this point.	Yes	R033	Department for Education
D4	The revised CIL Regulations remove pooling restrictions on use of s106 funds so they can be used to deliver off-site infrastructure.	Section (b)(i) and paragraph 4.17 can be amended to acknowledge this point.	Yes	R033 R036	Department for Education HUDU for CCG
D4	The policy includes a long list of potential planning obligations but does not identify key priorities. Policy DF 1(d) in the London Plan states priority should firstly be applied	A cross-reference to the London Plan policy can be added to the supporting text of D4. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
	to affordable housing and necessary public transport improvements before other contributions. This should be reflected in D4.				
D4	The policy is unjustified and inconsistent with national policy. It lists twenty-one items where the Council will expect planning obligations, but it is unclear what the Council expects and therefore how applicants could comply with these requirements. Nor is it evident that the Council has assessed the implications of all these requirements on the viability of development (NPPF, para. 57).	Further information about the requirements for the obligations listed is provided in relevant policies elsewhere in the plan. Planning obligations have been factored into the testing of the cumulative impact of proposed development plan policies and CIL on development viability. Clarification of these points can be added to the supporting text of D4.	Yes	R023	Home Builders' Federation
D4	The policy seeks to ensure Section 106 funding is secured to support and fund local improvements. Local stakeholders should be consulted prior to the agreement of Section 106 obligations. Local business and residential organisations are best placed to advise priorities. As a part of this, local businesses should be compensated for losses arising from disruptive developments.	Section 106 planning obligations assist in mitigating the impact of development to make it acceptable in planning terms. Planning obligations must meet the statutory tests in the CIL Regulations (necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development). Local stakeholders have an opportunity to comment on planning applications during consultation and can express views on measures that may be required to mitigate the impact of a development. Clarification can be added to the supporting text of D4 to explain this.	Yes	R030	WeAreWaterloo Business Improvement District
Section 5: Housing					
H1	The Plan has not been positively prepared because it fails to plan effectively to meet	In London, housing delivery is a strategic planning issue dealt with through the Mayor's London Plan	No	R023	Home Builders' Federation

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
	London's unmet housing needs through cooperation with other boroughs. It only intends to meet its share of the need on the basis of the London Plan – that is 13,350 homes over the period 2019/20-2028/29.	rather than by agreement between boroughs. The targets in the London Plan have been found sound following examination. London boroughs must plan to meet and exceed their London Plan housing targets. Lambeth has done this, with the Mayor's support.			
H1	The plan relies on the Mayor's flawed method for optimising capacity on small sites and relies on windfall supply. It should take a more proactive role in identifying and allocating sites of 1ha to support small builders and meet the requirements of national policy. This would also help provide a flatter housing trajectory with a more even rate of delivery over the plan period.	The DRLLP PSV is clear on the requirement to deliver at least 400 dpa on sites of less than 0.25ha, which reflects the lower figure resulting from the examination of the London Plan. This figure is reflected in the housing trajectory in Annex 13 of the DRLLP PSV and the evidence for this is set out in Topic Paper 2 (TP02). Site allocations will be dealt with in a subsequent Site Allocations DPD.	No	R023	Home Builders' Federation
H1	There is insufficient commitment to maximising housing delivery and exceeding the minimum housing target, particularly in terms of considering potential for industrial intensification and co-location with residential in KIBAs. See the Secretary of State direction to the Mayor in relation to the London Plan approach to industrial land.	The Local Plan must be in general conformity with the London Plan. This requires meeting and exceeding the housing target <i>and</i> retaining industrial floor-space capacity in the borough (because of Lambeth's Central Services Area location and in order to address the London Plan waste apportionment). Other than in a small number of identified cases, intensification in KIBAs must be for industrial uses not housing. Lambeth can meet and exceed its housing target without encroaching on more KIBA land. The DRLLP PSV is very clear in paragraphs 5.4 to 5.6 about its intention to maximise housing delivery.	No	R078	Caddick Developments

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H2	Overall approach supported but amendments required to section (a)(ii) and paragraphs 5.20, 5.26 and 5.28 to ensure full conformity following changes to the London Plan.	The council has agreed a statement of common ground with the Mayor to address these points (SCG01).	Yes.	R054	Mayor of London
H2	The Council's approach to collecting affordable housing obligations on housing schemes of ten units or fewer is contrary to national policy.	The justification for this policy is set out in Topic Paper 1 (TP01).	No	R023	Home Builders' Federation
H2	The policy is not clear what percentage of affordable housing is required overall. The tenure split is not in conformity with London Plan policy H7, so the viability report models the wrong tenure split. The viability report depends on questionable inputs (e.g. allowance for s106, exceptional costs, developer profit).	The Mayor has confirmed that DRLLP PSV policy H2 is in general conformity with the London Plan. It follows the Mayor's threshold approach to affordable housing and sets a borough-specific tenure split based on evidence in the Lambeth SHMA 2017 (EB09). The methodology and inputs in the viability report (EB98) are considered sound.	No	R023	Home Builders' Federation
H2	The policy no longer includes a requirement to take account of individual site circumstances including viability, which is not in conformity with London Plan policy H5 and is not consistent with national policy.	The policy approach in H2 fully aligns with the threshold approach set out in the London Plan, and the Mayor has confirmed general conformity. This is in turn consistent with national policy and guidance, which no longer seeks viability testing of individual applications on a systematic basis.	No	R068	JLL for Grainger plc
H2	There should not be a blanket cap on shared ownership where market sales values exceed £600,000. The HCA's affordability calculator should be used instead, based on no more than 45% of a household's net income being used to	The approach directly reflects that set out in the London Plan and associated Affordable Housing and Viability SPD. This was added in in response to the Mayor's comments at Regulation 18. The HCA approach would not take account of household's different savings levels.	No	R043	L&Q

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	support purchase of a shared ownership property.				
H3	Object to deletion of the section allowing house de-conversions. This is not justified.	The justification for the approach is set out in Topic Paper 2 (TP02).	No	R026	James Burton
H4	Recognise that 2B4P homes can contribute towards family housing provision.	Noted, but the London Plan defines family-sized as 3 bed+ (paragraph 4.2.9) so the approach is consistent with that.	No	R043	L&Q
H5	There should be more flexibility on external amenity space requirements for flatted schemes because the policy requirements are not always achievable.	The policy has already been amended from the adopted position to make clear that the communal space requirement for flatted schemes will only apply with 10 or more units. Flexibility is also provided within paragraph 5.50.	No	R035	Savills for Bellway Homes
H5	The requirement for dual aspect accommodation is not in general conformity with the London Plan and not justified	This requirement is already adopted policy and remains justified and in conformity with the London Plan. The Mayor has raised no issue of general conformity.	No	R068	JLL for Grainger plc
H6	The removal of the conversion stress approach is not justified because there is a shortage of family dwelling houses, which will be aggravated and/or it will add stress to an area and encourage illegal conversions.	The justification for the policy approach is set out in Topic Paper 2 (TP02). The policy requires a mix of unit sizes and provision of a family-sized dwelling at ground floor level where practicable.	No	R025 R026 R070	Stockwell Park RA James Burton Ms H Armstrong
H6	Replace 'as originally constructed' with 'as it existed 20 years ago' as it would be easier to verify	'As originally constructed' is adopted wording that works effectively at the level of decision-making and enforcement.	No	R066	Brixton Society
H7	Part (a) (i),(iii) and (vii) - the requirement not to compromise capacity to meet need for conventional dwellings is contrary to the London Plan and PPG; the requirement for nominations agreements is onerous; the	The policy provisions are considered to be justified, effective and consistent with both national policy and the London Plan. See Topic Paper 9 (TP09).	No	R059	Turley for Alumno Group

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	requirement for 10% wheelchair accessible units is onerous and unjustified.				
H7	Part (a)(iv) - the tests of over-concentration and mixed and balanced communities are onerous, not justified, effective and/or not consistent with national policy. No evidence provided of harm caused by PBSA; no threshold set; terms are not defined; impacts can be assessed and mitigated at application stage.	The policy provisions are considered to be justified and effective and consistent with national policy. See Topic Paper 9 (TP09).	No	R046  R059	ROK Planning for Unite Students  Turley for Alumno Group
H8	The policy should give more explicit support for older people's housing to be positively prepared; and sites should be allocated.	The policy cross-refers to London Plan policy H13. Paragraph 5.77 makes clear the policy applies to older persons' housing. Evidence on need is set out in the Lambeth SHMA 2017 (EB09). Potential for site specific allocations will be considered through the SADPD.	No	R023  R037	Home Builders' Federation Coin Street Community Builders
H8	The London Plan benchmark target of 70 units a year should be used to monitor delivery. Clause (d) is overly restrictive and will constrain supply.	The London Plan benchmark is included in Annex 8 Monitoring Framework of the DRLLP PSV, as stated in paragraph 5.85. Part (d) and paragraph 5.80 are considered reasonable to ensure housing is designed appropriately.	No	R023	Home Builders' Federation
H10	The plan does not take account of the Mayor's new definition of gypsies and travellers in London Plan policy H14.	The council has agreed a statement of common ground with the Mayor to respond to this point (SCG01).	No	R054	Mayor of London
H11	The requirement for at least 50% affordable housing does not take account of scheme viability and is not consistent with the London Plan.	All estate regeneration proposals must be viability tested and the Mayor has raised no concern about the general conformity of this policy. However, clarification of the approach can be added.	Yes	R035  R043	Savills for Bellway Homes L&Q

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H11	There should be flexibility for tenure split from the requirements of H2.	Part (c) of the policy sets out the approach to tenure in estate regeneration schemes, which includes flexibility.	No	R043	L&Q
H11	Clarify in the supporting text that the requirement for the proceeds of shared ownership sales to go to Homes for Lambeth will only apply to Council owned estates	Clarification can be added to the supporting text that the proceeds should go to the registered provider that manages the estate, for re-use within Lambeth.	Yes	R043	L&Q
H11	Include a requirement for resident ballots. Infill development should only be supported to enable phasing, with no loss of estate amenity space. Embodied energy in existing structure should be taken into account – reuse if preferable to demolition.	Resident ballots are not a matter for planning policy. Part (e) of the policy cross references EN1(a)(ii), which sets out the criteria that will apply to housing estate amenity land. Embodied energy is covered by policies in the Environment section of the Plan. London Plan policy H8 will also apply.	No	R066	Brixton Society
H11	Make clear in the policy wording, not just the supporting text, that the policy applies to schemes led by the Council and/or other RPs	It is appropriate for this statement to be in supporting text, but further clarification can be added.	Yes	R068	JLL for Grainger plc
H12	The additional requirements in parts a) to d) of the policy are restrictive, not justified, not in general conformity with the London Plan and not consistent with national policy and guidance.	See the justification and explanation in Topic Paper 9 (TP09). The Mayor has raised no concern about the general conformity of this policy with the London Plan.	No	R041 R057 R068	TfL Commercial Development Avison Young for Connected London Living JLL for Grainger plc
H13	To be positively prepared, there should be more flexibility about the locations in which this form of development will be supported. The approach is not justified.	See the justification and explanation in Topic Paper 9 (TP09).		R078 R085	Caddick Developments Avison Young for unspecified developer
H13	The requirements in parts a) and b) are not justified and/or not effective and/or not	See the justification and explanation in Topic Paper 9 (TP09). The Mayor has raised no concern about		R046	ROK Planning for Unite Students

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	consistent with national policy and/or not in conformity with the London Plan.	the general conformity of this policy with the London Plan.		R061 R078	Turley for Olympian Homes Caddick Developments
<b>Section 6: Economic Development, Retail and Town Centre Uses</b>					
ED1	The London Plan in Policy E1C and D directs new office development to the Central Activities Zone (CAZ) and the borough's town centres, taking into account the Town Centre Network office guidelines set out in Table A1.1 of the London Plan and Figure A1.4 in Annex 1. Lambeth should seek to amend draft Local Plan Policy ED1b) of the draft Local Plan to bring it in line with the London Plan.	Lambeth has agreed a statement of common ground with the Mayor to respond to these points (SCG01).	Yes	R054	Mayor of London
ED1	Not positively prepared or effective without the inclusion of additional criteria such as where improved healthcare facilities may justify the loss of office floor-space, or to encourage new and innovative forms of workspace.	The policy is effective and has sufficient flexibility at part (c) to allow for particular site-specific circumstances.	No	R024 R037	King's College Hospital Foundation Trust Coin Street Community Builders
ED1	Not positively prepared because the most successful workspaces are not fitted out to a particular standard, and lacking justification of the required 'turnkey' standard which could have viability implications.	Parts (g) and (h) include flexibility in relation to the required standards of provision and their management.	No	R037 R055	Coin Street Community Builders Arch Company
ED1	Not justified as the policy should address ways in which co-working spaces can be incorporated into non-office developments.	The policy approach is in general conformity with Policy E2 of the London Plan in relation to supporting new business uses. DRLLP PSV policy ED14 (j) also requires the provision of facilities for	No	R047	PPHE Hotel Group

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		business users including workspace within hotel developments, and encourages these facilities to be made available for public use.			
ED1	The requirement to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises should not be applied where office space is required for one organisation.	Criterion (f) encourages but does not require the provision of space suitable for micro, small and medium-sized enterprises. This is in line with Policy E2 of the London Plan.	No	R080	MEC Property Limited
ED1	Seeks clarification on Part c)(iv) and whether the lost B1a floorspace would be required to be re-provided within primary shopping areas.	Policy ED1 directs new office floorspace to within town centres, Opportunity Areas and the CAZ but would not be specifically required to be re-provided within the Primary Shopping Area.	No	R076	Hondo Enterprises
ED1	Requirement for two years' marketing is overly restrictive and contrary to E1 of the London Plan.	Policy E1 of the London Plan stipulates one year as a minimum which does not preclude setting a borough-specific approach.	No	R082	Tucan Investments Limited
ED1	Support for location of large offices in appropriate locations but seeking clarifications that archways will not cumulatively trigger the 1,000sqm locational threshold.	The threshold will be triggered on proposals for more than 1,000sqm for each planning unit.	No	R055	Arch Company
ED2	Affordable workspace requirement on the gross floor-space and not the uplift is not positively prepared or justified; proposing viability challenges and will remove incentives to provide new and refurbished office floor-space. This is not consistent with aims of London Plan SD5 and is inconsistent with aims of NPPF para 81.	Paragraph 6.15 sets out that the policy will apply to all applications involving 1,000sqm or more gross B1a office floorspace (GIA) in the areas of Lambeth identified in part (a). This includes both applications for the redevelopment and extension of existing offices, and to refurbishments resulting in increases in quality and rental value of the space. This approach is to secure the maximum benefits of the policy approach to be captured from the full range of schemes likely to come forward	No	R018 R064 R067 R076 R078 R080	WCPS Bourne Capital Stanhope PLC Hondo Enterprises Caddick Developments MEC London Property

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		within the borough, including from refurbishment schemes which in many circumstances secure significant uplifts in values. There is flexibility built into this approach through the viability clause at part (f), potential for payment in lieu in part (e) and detail set out within paragraph 6.15.			
ED2	To be positively prepared there should be additional flexibility within the policy including allowing deviation from the three approaches to provide an alternative meaningful offer; provision of affordable space within other (non-B class) use classes and in other formats; and the timing of delivery of workspace.	Policy ED2 is sufficiently flexible to allow for site-specific responses including the viability clause at (f) and the ability to provide a payment in lieu at (e). Paragraph 6.15 also sets out further flexibility in relation to the provision of space in other B1 use classes and the potential implications on quantum requirements. The Local Plan and Community Infrastructure Levy Viability Review December 2019 (EB98) and the Brixton Creative Enterprise Zone: Affordable Workspace Analysis 2018 (EB99) have tested and confirmed viability of the provision of affordable workspace within B1 uses from schemes containing office (B1a) floorspace and therefore it is not considered appropriate to extend this to other non B1 class uses. It also sets out how space should be designed to meet a local need within B1 use classes and the council will endeavour to work with developers to ensure that the provision of affordable workspace responds to local economic sectors and their requirements.	No	R018 R038 R042 R053 R060 R063 R067 R076	WCPS Andrew Sissons Consulting Gerald Eve for Kessler (SLR) Limited Guy's and St Thomas' Charity HB Reavis Bywater Properties Stanhope PLC Hondo Enterprises
ED2	Concerns relating to the viability testing evidence including: rental levels; typologies of schemes tested; not utilising proposed CIL rates; and lack of full testing of	The policy approach has been developed utilising evidence and testing from the Local Plan and Community Infrastructure Levy Viability Review December 2019 (EB98) and the Brixton Creative	No	R018 R046 R055 R064	WCPS Unite Students Arch Company Bourne Capital

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	potential for policy to require collaborative or shared workspace.	Enterprise Zone: Affordable Workspace Analysis 2018 (EB99). This tested a variety of typologies across different areas of the borough which included appropriate sensitivities, and utilised standard industry methodologies to do so.			
ED2	Concerns regarding the viability implications on schemes of the proposed length of agreements; utilising CIL charging zones; cumulative viability impacts of mixed-use schemes also providing affordable housing; and the time and cost of the viability caveat.	The viability implications of the approach have been tested within the Local Plan and Community Infrastructure Levy Viability Review December 2019 (EB98) and the Brixton Creative Enterprise Zone: Affordable Workspace Analysis 2018 (EB99). This tested a variety of typologies across different areas of the borough including appropriate sensitivities.	No	R038 R055 R076 R080	Andrew Sissons Consulting Arch Company Hondo Enterprises MEC London Property
ED2	Part f) is unjustified, and it is inconsistent with national policy to require through viability testing an additional amount of affordable workspace over the policy compliant amount.	The approach taken to viability re-appraisal for affordable workspace follows closely the methodology developed by the Mayor of London within the Affordable Housing and Viability SPG which also allows for securing additional affordable space above the policy threshold should a surplus be identified.	No	R055	Arch Company
ED2	Clarifications relating to the application of the policy including on criteria for inclusion on council's affordable workspace provider list and how an organisation will be able to do so.	The council is preparing a draft Affordable Workspace SPD to provide further detail and guidance on the application of the policy including criteria for inclusion on the council's affordable workspace provider list which the council is in the process of developing.	No	R069 R078	Guy's & St Thomas' NHS Foundation Trust Caddick Developments
ED2	Suitability of the affordable workspace thresholds and in particular locations.	The affordable workspace thresholds have been tested within the Local Plan and Community Infrastructure Levy Viability Review December 2019 (EB98) and the Brixton Creative Enterprise	No	R063 R064 R066	Bywater Properties Bourne Capital Brixton Society

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		Zone: Affordable Workspace Analysis 2018 (EB99) which tested a variety of typologies across different areas of the borough, including appropriate sensitivities.			
ED2	Requires clarification that archway conversions where of different planning unit but collectively equal 1,000sqm would not trigger affordable workspace requirements; and that it only applies where change of use from a non-B class to B1a.	The threshold will be triggered on proposals for more than 1,000sqm for each planning unit and where new floorspace is being provided.	No	R055	Arch Company
ED3	The policy approach is welcomed but emphasise Lambeth's location within the Central Services Area (CSA) and include fuller explanation of strategic approach in supporting text. Focus more on prioritising B2 and B8 uses over and above B1(c) uses. Encouragement to set out the ability of the borough's remaining industrial land to accommodate greater amounts of industrial floor-space capacity.	Lambeth has agreed a statement of common ground with the Mayor to respond to these points (SCG01).	Yes	R054	Mayor of London
ED3	The policy is too restrictive and should allow offices in KIBAs and/or adopt a site-specific approach. Offices make industrial schemes viable and not allowing co-location with offices will have a negative impact on the economy. Consider the implications of the Secretary of State's direction on the London Plan.	The justification for the proposed approach is set out in the Review of KIBAs (EB24) and in the supporting text to ED3.	No	R038 R051 R063	Andrew Sissons Consulting Workspace Management Ltd Bywater Properties

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ED3	Some existing KIBAs are primarily in office use which is not considered to be 'industrial'.	The justification for the proposed approach is set out in the Review of KIBAs (EB24) and in the supporting text to ED3.	No	R051 R078	Workspace Management Ltd Caddick Developments
ED3	Lambeth has not properly considered potential for co-location of industrial and residential uses. Consider the implications of the Secretary of State's direction on the London Plan.	Consideration of potential for intensification and co-location is set out in the Review of KIBAs (EB24) and explained in the supporting text to ED3.	No	R063 R078	Bywater Properties Caddick Developments
ED4	Further research is required into stacked industrial concepts before this becomes policy.	ED4 cross-refers to London Plan policy E7A, which has undergone examination.	No	R038	Andrew Sissons Consulting
ED4	The policy should allow loss of floor-space where it will be replaced within the vicinity in Lambeth.	This policy cross refers to London Plan policy E7C, which includes flexibility on Non-Designated Industrial Sites. See also the council's response to comments on part (b) of Policy ED6, which specifically relates to railway arches.	No	R055	Arch Company
ED4	An exception should be added which would support redevelopment of employment floor-space at the King's College Hospital site.	Lambeth wishes to work with King's College Hospital on its emerging master-plan for the reconfiguration of its estate. In the absence of a master-plan, it is not possible to justify a different approach to this policy for a particular site. Once a master-plan has been progressed, there is potential for the site to be considered in the Site Allocations DPD and/or through a future review of the Local Plan.	No	R024	King's College Hospital Foundation Trust
ED6	Part b) of the policy is too restrictive so not effective, justified, positively prepared or consistent with national policy. Change of use should be considered under other plan policies.	Noted, there is potential to amend this clause. Supporting text would also be added to encourage landowners to take a comprehensive approach to changes of use of railway arches, where possible.	Yes	R055 R056	Arch Company Network Rail

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ED6	Part d) should ensure the improvements sought are proportionate to the scale and scope of works being applied for and not make schemes unviable.	Clarification can be added to make clear the statutory tests for planning obligations will apply.	Yes	R055 R056	Arch Company Network Rail
ED7	Part c) should refer to CAZ retail clusters to ensure it is effective and consistent with national policy.	Accepted, this requires updating. A reference to CAZ Retail Clusters can be added to ED7(c).	Yes	R013	Tulley Bunting for BFI
ED7	Requirement for sequential test is supported but policy should be relaxed to allow town centre uses at edge-of-centre and out-of-centre locations.	ED7 (d) is consistent with NPPF paragraph 90.	No	R046	ROK Planning for Unite Students
ED7	Scale is no longer a national policy test for town centre uses. The requirement is not justified and will unnecessarily restrict hotel accommodation within the borough. Part c) of this policy should cross refer to Policy ED14.	The scale of development is a valid consideration for a Local Plan policy. Different town centres in Lambeth have different roles in accordance with the town centre hierarchy and include a range of uses. Development should be appropriate to those centres.	No	R077	Barton Willmore for London Hotels Group
ED8	ED8 does not address emerging trends in food and drink uses, such as restaurants being more reliant on takeaway /deliveries. The resulting traffic from these uses is not addressed.	ED8 (f) addresses home delivery services.	No	R066	Brixton Society
ED8	Part (e) is not positively prepared, effective or justified and is inconsistent with national policy. No assessment has been made of the impacts of the number of takeaways affected or on other impacts aside from health. The background paper is inconsistent and does not reflect research	The justification is set out in Topic Paper 4 (TP04) and Promoting Healthy Eating in Lambeth (EB41), which includes evidence from Lambeth's public health service.	No	R071	SSA Planning for Kentucky Fried Chicken (GB) Ltd

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	around proximity of hot food takeaways to schools.				
ED8	Part (a) is unsound because there is no reference to the contribution made by the evening economy in the Strategic Cultural Area, which is inconsistent with the NPPF. It is inconsistent with PN1 and should be amended to ensure evening and food and drink uses are also encouraged within the South Bank/Bankside Strategic Cultural Area.	ED8 applies to food and drink uses and directs these uses towards town centres and CAZ retail clusters in accordance with the town centre first principle. The Strategic Cultural Area makes a wider contribution to the evening economy than solely food and drink uses. Food and drink uses in the Strategic Cultural Area will be considered against the requirements of ED13 (d).	No	R013	Tulley Bunting for BFI
ED13	There is not enough flexibility in the policy to accommodate food and drink uses in the South Bank. The policy should recognise the positive contribution that food and drink uses make to the evening economy, especially complementing other uses in the South Bank cultural area.	Food and drink uses are considered under ED8. The contribution of the Strategic Cultural Area to the evening economy, which is wider than food and drink uses, is recognised in PN1. Commercial development, which could include food and drink uses, in the Strategic Cultural Area would be considered against the requirements of ED13 (d).	No	R013	Tulley Bunting for BFI
ED13	Part (b) of the policy could compromise delivery of cultural facilities in Lambeth because the obligations set out in this part of the policy are too onerous and could leave projects such as the restoration of Streatham Hill Theatre (also promoted within this plan) as unviable. Amending the text to 'may' would offer greater flexibility.	Planning obligations will be applied in accordance with the tests in CIL Regulation 122. Facilities that attract large numbers of visitors have an impact on the immediate area and public realm, which must be mitigated and managed. This is therefore a reasonable requirement to make proposals acceptable in planning terms.	No	R021	Theatres Trust
ED13	Part (c) of the policy could be interpreted too narrowly to require replacement of a specific use rather than a use class. There	The policy protects visitor attractions, leisure, arts and cultural uses rather than individual facilities. Further clarification can be added to the supporting text.	Yes	R041	TfL Commercial Development

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	should be flexibility to allow change of use where justified.				
ED14	Part a) - the approach to hotels outside of town centres is more onerous than the London Plan and fails to recognise the sequential test approach set out in the NPPF. There is no justification for excluding local centres.	The justification is set out in Topic Paper 5 (TP05).	No	R077 R082 R044	Barton Wilmore for London Hotel Group RPS for Tucan Investments Ltd WSP Indigo for Espalier Ventures and MELT Property
ED14	Part a) - the requirement for visitor accommodation to be an 'appropriate scale' is vague and unclear – scale has not been a national policy test for main town centre uses since 2009 and this approach is not justified.	The justification is set out in Topic Paper 5 (TP05). The scale of development is a valid consideration for a Local Plan policy.	No	R077	Barton Wilmore for London Hotel Group
ED14	Part b) - the requirements to prevent additional visitor accommodation in residential neighbourhoods, to restrict the size of hotels to 100 rooms, to prevent the intensification of existing provision and to prevent the loss of office space in Vauxhall are overly restrictive and not consistent with the London Plan.	The justification is set out in Topic Paper 5 (TP05).	No	R041 R077	TfL Commercial Development Barton Wilmore for London Hotel Group
ED14	Part c) - the blanket restriction on C1 uses within the Waterloo area of the Central Activities Zone is too restrictive and conflicts with the aspirations of the adopted and London Plan which does not seek to restrict hotel development on the basis of the supply position. It is clear from London Plan	The justification is set out in Topic Paper 5 (TP05).	No	R031 R044 R047	BNPP for Marlin Apartments WSP Indigo for Espalier Ventures and MELT Property DP9 for PPHE Hotel Group

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	policies and targets for new hotel rooms that there remains an increased appetite for hotel accommodation in London, particularly on existing sites and within the compact luxury market.			R049 R050 R077	ROK Planning for Waterloo Hub Hotel Limited ROK Planning for Southbank Hotel Management Company Limited Barton Wilmore for London Hotel Group
ED14	Part d) should be revised to make it clear that 'the locations above' refer to clauses a), b) and c).	Part (d) can be amended to clarify this. Clarification can also be made to part (e).	Yes	R049 R050	ROK Planning for Waterloo Hub Hotel Limited ROK Planning for Southbank Hotel Management Company Limited
ED14	Part e) is not clear or justified and should be deleted. The supporting text should not include reference to historic planning permissions as these may no longer be relevant.	The justification is set out in Topic Paper 5 (TP05). Reference to historic planning permissions to be removed from the supporting text.	Yes	R044 R049 R050 R077	WSP Indigo for Espalier Ventures and MELT Property ROK Planning for Waterloo Hub Hotel Limited ROK Planning for Southbank Hotel Management Company Limited Barton Wilmore for London Hotel Group

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ED14	Part j) - the requirement for all new hotels to provide facilities for business visitors, including meeting rooms and workspaces is considered to place an overly onerous burden on small hotels – requirement only appropriate on hotels over a certain size.	Supporting text to be amended to specify that new hotels will be expected to provide facilities for business visitors unless it is demonstrated it is not feasible because the hotel is too small to accommodate these facilities.	Yes	R041	TfL Commercial Development
ED14	As a minimum, hotel proposals should provide pick-up/set-down points for taxis, and ideally coaches. There appear to be no specific requirements for deliveries of supplies and laundry – there should be a cross-reference if this is covered by a more general policy elsewhere.	Part (k) of the policy covers pick-up and set-down points and sets out an appropriate approach on a case by case basis. Servicing requirements will be considered under Local Plan policy T8.	No	R066	The Brixton Society
ED15	The requirement for a minimum of 25% of all jobs created by the development (in both the construction phase and the first two years of end-use occupation of the development) to be secured for local residents is considered onerous and/or not realistic and/or not consistent with NPPF paragraph 16 or London Plan policy GG5.	The 25% target is based on data on the number of jobs filled by Lambeth residents. In conjunction with the explicit use of reasonable endeavours, this approach is justified and deliverable and has already worked effectively in a number of approved developments. The 25% target for end use employment would only be expected to be created from new roles arising from the development. This can be clarified in the supporting text.	Yes	R041 R053 R060 R076 R080	TfL Commercial Development Savills for GSTT DP9 for HB Reavis DP9 for Hondo Enterprises DP9 for MEC London Properties
ED15	The requirements of the policy should not apply to change of use applications – they are excessive for this type of development and therefore not consistent with national policy and regulations governing planning obligations.	Change of use applications have potential to create new end-user jobs. The approach being taken would recognise any current workforce already employed and therefore the target to achieve 25% local employment would only apply to additional jobs being created.	No	R055	Turley for ArchCo

Section 7: Social infrastructure

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
S1	The policy is not consistent with national policy because a payment in lieu does not ensure replacement of playing fields by provision of equivalent or better quality and quantity in a suitable location.	The supporting text can be amended to clarify that policy S1 applies to indoor sports and recreation facilities and that outdoor sports and recreation facilities including playing fields will be protected under policy EN1. This can also be clarified in the supporting text to EN1. Payments in lieu are not allowed for under EN1. See the statement of common ground with Sport England (SCG25).	Yes	R007	Sport England
S1	The policy is not effective in protecting facilities because it allows for a payment in lieu or a smaller quantity of replacement floorspace.	Payments in lieu are only acceptable in exceptional circumstances where the tests in part (c) are met. The policy has been amended to refer to functionality rather than size of replacement space because this is a more effective approach.	No	R083	Friends of Lambeth Libraries
S1	To be effective there should be flexibility in the policy: 1. For change of use between D1 and D2 but also D1/D2 to other use classes and vice versa (e.g C2, B1(a)) 2. For emergency services	The policy appropriately allows for response to identified need and demand and facilitates the implementation of agreed strategies for the provision and improvement of community premises.	No	R033 R052 R069	Department for Education London Fire Commissioner Guy's and St Thomas' NHS Foundation Trust
S2	The policy is not positively prepared because public libraries are barely represented in the section.	Policy S2 applies to all forms of social infrastructure and libraries are specifically mentioned in paragraphs 7.1, 7.3, 7.4 and 7.19.	No	R083	Friends of Lambeth Libraries
S3	Delete the reference to the Council's agreed strategy for provision of school places as not consistent with the NPPF paragraph 94.	The Council's approach to school place provision takes account of Free Schools. In the Council's view the proposed policy approach is consistent with NPPF paragraph 94.	No	R033	Department of Education
S3	The plan fails to identify sufficient sites for schools for its 10-15 year horizon.	The Infrastructure Delivery Plan (EB100) sets out projects to accommodate school place need over the plan period.	No	R066	Brixton Society

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Section 8 Transport and communications					
T1	Buses should be further prioritised in the road user hierarchy.	The Plan recognises the importance of buses as the primary mode of public transport in Lambeth, but the needs of buses and cycling need to be considered separately, albeit within the overarching Healthy Streets approach. The Road User Hierarchy reflects both the need to prioritise vulnerable road users and to promote active travel modes. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
T2	Add reference to Vision Zero	Agreed that reference can be added. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T3	Add references to Vision Zero, cycle hire business accounts, provision of EV charge points across cycle stand types, London Cycle Design Standards; and add definition of pool bikes. Clarify that cycle hire provision is in addition to cycle parking requirement.	These references, definition and clarification can be added. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T3	Add further guidance on geographical extent of developer contributions.	The preferred approach to consider each development on a case by case basis, taking into account specific factors e.g. type and volume of trips expected and need to ensure these can be made in a safe, sustainable and inclusive way. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
T3	Requirement to provide charge points for cycles is too onerous	The requirement for the provision of one charge point per ten cycles is considered proportionate to expected demand given the increasing market share of electrically assisted cycles.	No	R023 R043	Home Builders' Federation L&Q
T3	Requirement to provide cycle hire membership is too onerous	Policy wording states that a minimum of 3 years' membership is required, which is precise and easily understood. The Council accepts that not all residents may wish to cycle. In practice this requirement may be met through negotiation with service providers to ensure provision is available for all those that wish to have membership at a reasonable overall cost.	No	R023	Home Builders' Federation
T3	Requirement to provide Sheffield stands is too onerous	The Council recognises the need for space-efficient cycle parking solutions, particularly for constrained sites, and the policy strikes a balance between the need to use space efficiently and the need to ensure that people with disabilities, those less able to use two tier stand types, and those with larger or adapted cycles are not excluded from using the facilities provided. The provision of 25% in the form of Sheffield type stands, incorporating the disabled cycle parking requirement, is considered an appropriate balance between these needs and consistent with the Council's broader policy objectives to promote cycling to all members of the community.	No	R043 R068	L&Q Grainger
T3	Requirement to provide pool bikes in student accommodation is not justified	The Council will consider the appropriateness of the provision of pool bikes on a case by case basis, but such provision is considered particularly likely	No	R046	Unite Students

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
		to be of benefit where the residential population of a development is expected to be transient.			
T3	A flexible approach to cycle parking is required, particularly for constrained sites	The Council requires that cycle parking standards are met in full, both in relation to quantity and quality. The Council will work with developers to find suitable solutions where specific local constraints apply.	No	R055 R060 R076	Arch Company HB Reavis Hondo Enterprises
T3	Provision for folding bikes should be considered	Agreed that in some circumstances the provision of folding bikes and storage for these may be appropriate.	Yes	R060 R076	HB Reavis Hondo
T4	TfL is not actively progressing the development of the extension of the Tram network to Crystal Palace as it is unlikely to offer good value for money and suggest the removal of this scheme from the list of transport infrastructure projects	The extension of the tram network to Crystal Palace remains an aspiration for the Council and has been included at the request of the London Borough of Croydon. –The policy wording can be amended to reflect this degree of uncertainty, but retain the reference. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T4	The significance of Crossrail 2 for Lambeth should be further emphasized.	The supporting text can be amended to reflect this. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T4	Contributions from development towards public transport infrastructure should be proportionate to the projected number of additional trips arising from the development	This is clearly stated in part (d) of the policy.	No	R060	HB Reavis
T4	Reference to specific additional bus corridor improvements should be added.	The proposed policy wording refers to the need for bus service improvements across the borough, with a particular focus on areas where growth is expected. This is considered a comprehensive	No	R066	Brixton Society

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		approach that allows for specific corridors as appropriate. Further guidance on bus provision will be considered as part of the Council's Transport Strategy (EB44) Implementation Plan.			
T4	Reference to East Brixton Station should be added.	The Council's priority in the area is to re-develop the existing Brixton Station, including with the provision of step free access and to promote similar improvements at Loughborough Junction.	No	R066	Brixton Society
T7	Clarify reference 'avoid reliance on the public highway for parking needs'	The reference can be changed to 'requirement' rather than 'need'. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T7	A more flexible approach to providing disabled parking on the highway is suggested.	The preferred approach is to consider each site on a case by case basis, taking into account specific factors including highway capacity. The supporting text can be amended to clarify that minimum requirements at the outset should, wherever possible, be met within the site, but that a more flexible approach can be taken to meeting future demand. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T7	The Council should consider capping permit numbers within CPZs.	This is not considered to be a matter for the Local Plan and will be addressed through other policies. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
T7	Car clubs should only be supported in areas of PTAL 3 and below.	The preferred approach is to consider each site on a case by case basis, taking into account specific factors including highway capacity and the local travel context. We consider that the need for occasional car use is not restricted solely to low	Yes	R048	Transport for London

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		PTAL areas, but recognise that car clubs will be more appropriate in this context. Supporting text can be amended to reflect the particular needs of low PTAL areas. We acknowledge the need to link car club policy to wider management of parking and this will be addressed by the council's forthcoming Kerbside Strategy, rather than in the Local Plan. The Kerbside Strategy forms part of the Transport Strategy (EB44) Implementation Plan which is referenced in the Local Plan. This is covered in the statement of common ground with the Mayor (SCG01).			
T7	In areas of PTAL 4-6 permit free status should apply with CPZs expanded to support this.	Agreed. A statement can be added that all PTAL 4-6 should be permit free. Broader CPZ policy will be addressed by the Council's forthcoming Kerbside Strategy, rather than in the Local Plan. The Kerbside Strategy forms part of the Transport Strategy (EB44) Implementation Plan which is referenced in the Local Plan. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T7	More stringent parking standards may result in overspill parking	This issue is addressed in the Statement of Common Ground with Bromley (SCG04). Noted that Bromley are less concerned about boundary areas with Lambeth as these have a relatively good provision of public transport.	No	R015	London Borough of Bromley

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T7	Requirement for car club membership is too onerous as not all residents may wish to take this up.	Policy wording can be amended to make clear that membership should be 'made available' to all residents. In practice this is likely to involve the purchase of a 'block' of membership covering a given development.	Yes	R023	Home Builders' Federation
T7	Requirement for EV charge points should not refer to the London Plan, but rather be left to Building Regulations. Consideration should be given to grid capacity in relation to EV charging requirement and need to re-enforce this. EV charging requirement should be more closely specified.	EV charging is a matter for planning policy in addition to Building Regulation. Grid capacity requirements will be determined and planned at a national and regional level taking into account relevant policy frameworks. Type and specification of EV charging points will be considered as part of the Council's broader EV charging strategy included in the Transport Strategy (EB44) Implementation Plan.	No	R023	Home Builders' Federation
T7	Site specific solutions to disabled parking requirements should be permissible according to local context.	The required quantity of parking for people with disabilities is set by the London Plan and this must be applied in all cases. Site specific solutions for the delivery of this policy will be considered on a case by case basis. This will be clarified in supporting text.	Yes	R060	HB Reavis
T8	Add reference to Fleet Operator Recognition Scheme (FORS) and Direct Vision Standard. Non-(motor) vehicular modes should be promoted for servicing activity.	Agreed, references can be added. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T8	Policy should promote consolidation of deliveries even where a traditional consolidation centre is not used e.g.	Policy T8 (b) can be amended to emphasise that all development should consider such measures, not just major development.	Yes	R060	HB Reavis

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	through both common procurement strategies and local procurement strategies.				
T9	Emphasise that minicabs, taxis and private hire vehicles are not considered to be sustainable travel modes.	It is acknowledged, that these modes should have lower priority than walking, cycling and public transport. This is already reflected in the council's road user hierarchy, but further clarification of this can be added. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
T9	Taxis should not be considered in the same context as mini-cabs or ride hail services as a different legislative framework applies to Private Hire Services. Taxis have unique characteristics such as wheelchair accessibility, 'compellability' and driver training standards. Policy should recognise the contribution taxis make to lowering vehicle emissions. Merely 'purporting' to support taxis infringes the Equality Act 2010 as older people and people with disabilities will be adversely affected.	Taxis are already promoted in the Plan, including through the Road User Hierarchy contained in Policy T1 Sustainable Transport. For clarity, policy text can be amended to refer to 'Licenced Taxis' and Private Hire Vehicles. Language can also be amended in Policy T1 (c), Policy T9 (a), supporting text 8.47, 48 and 49. Supporting text can also be added to T9 to refer to Licensed Taxis only, including reference to accessibility, training and emissions.	Yes	R073	United Cabbies Group
T10	There is no mention of telephone boxes – these should not be granted where there is little requirement. Existing telephone boxes should be granted a change to useful community spaces and hubs to enhance public realm.	The policy provides an appropriate and comprehensive basis for determining applications relating to telephone boxes.	No	R030	WeAreWaterloo Business Improvement District
Section 9: Environment and green infrastructure					
EN1	Seek clarification on how planning obligations will be calculated for the maintenance and management of new and	Approach is set out in paragraph 9.10 of supporting text.	No	R023	Homes Builders' Federation

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	improved open space and if and how they will be calculated for green infrastructure.				
EN1	Elements of the policy are unsound because they are contrary to national policy. Biodiversity gain will soon become a mandatory part of the planning system. There is no need for the Council to make policy in this area. Its own policy will be superseded by national regulation.	This is currently a proposal at national level and is yet to be consulted on or agreed. It would be wrong to anticipate future changes that have not yet been agreed or implemented. Meanwhile, the Local Plan policy approach is appropriate.	No	R023	Homes Builders' Federation
EN1	The policy should incorporate flexibility on quantity vs quality of open space and/or urban greening and/or inaccessible or inactive amenity areas of housing estates.	The Council does not agree there should be flexibility in terms of quantity and quality of open space. It is important to protect open space. In terms of urban greening the policy follows London Policy G5. There is already a separate part in the policy for housing estate amenity areas.	No	R033 R063 R035	Department of Education Bywater Properties Savills for Bellway Homes
EN1	That open space deficiency is potentially made worse through the policy exception for housing estate amenity areas and through allowing commercial events in major public open spaces.	Proposals affecting housing estate amenity areas must demonstrate that significant regeneration and community benefits would be achieved that could not be achieved in any other way, and that appropriate compensatory provision for the loss of open space is made, including improvements to the quality of remaining open space. Proposals for commercial events on open spaces are assessed through the planning application process and are not automatically allowed by the policy.	No	R066	Brixton Society
EN1	The policy does not provide adequate protection for playing fields as a form of open space and therefore also does not meet the tests of the NPPF in paragraph 97.	The definition of open space in the supporting text can be clarified to include explicit reference to playing fields. See the statement of common ground with Sport England (SCG25).	Yes	R007	Sport England

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EN3	The policy is unjustified because it could inhibit innovation in the area of zero carbon energy and may be out-of-step with Government thinking in this area. It should be deleted.	The policy is required to be in general conformity with London Plan SI3.	No	R023 R068	Home Builders' Federation Grainger plc
EN4	The policy does not recognise the risks posed to the historic environment and makes no distinction between historic buildings and modern development.	A reference to the requirements for historic assets, including climate change mitigation alteration and adaption responses, is provided in policy Q18. However, further clarification of this can be added to policy Q18 and supporting text of EN4.	Yes	R022	Historic England
EN4	Part e) is unsound because it is unjustified. The Local Plan should not make policy that sets standards for the environmental performance of new homes that are different to or exceed those already contained in the London Plan or national regulatory requirements, including the Home Quality Mark and Passivhaus standards and these could be superseded by the Future Homes Standard.	Part (e) states that proposals should demonstrate in a supporting statement that sustainable design standards are integral to the design, construction and operation of the development. It encourages use of the Home Quality Mark and Passivhaus design standards for new residential development as a way of achieving sustainable design, construction and operation. The Future Homes Standard has a different, more specific focus – it applies to low carbon heating and energy efficiency; and it is acknowledged in supporting text.	No	R023	Home Builders' Federation
EN7	Some concerns about the approach to planning for waste capacity in the borough and how this will be achieved. Further clarification required on the overall approach to net self-sufficiency and how the borough waste apportionment will be met. The policy should encourage intensification of existing sites to help meet the capacity	Lambeth has agreed a statement of common ground with the Mayor to respond to these points (SCG01).	Yes	R054	Mayor of London

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	gap and could set out a mechanism to prioritise waste uses in the most suitable KIBAs.				
EN7	Lambeth should offer surplus waste capacity to other boroughs. Failure to do this and the requirement for replacement capacity to be provided within Lambeth are inconsistent with the London Plan. A plan-led approach should be taken to release of waste sites.	Lambeth does not have surplus waste capacity and so is not in a position to offer capacity to other boroughs. The Mayor has not raised a concern about the general conformity of this approach to safeguarding capacity with the London Plan. The approach to require compensatory capacity within Lambeth is important because there is also a capacity gap for Lambeth, and so any loss of capacity would make it much more difficult to provide sufficient capacity to meet the borough's needs. A plan-led approach has been taken as set out in EN7 and supporting text. All existing waste sites in Lambeth are safeguarded for waste use. The policy also identifies suitable land for new waste facilities to meet the capacity gap over the plan period.	No	R027	Norwood Action Group et al
EN7	Clarification required in supporting paragraph 9.66 about the role of WRWA in collecting and managing municipal rather than household waste.	Paragraph 9.66 can be amended to clarify this.	Yes	R004	Western Riverside Waste Authority
Section 10 – Quality of the built environment					
Q7	Clarification is needed in (x) about how the optimum future development will be assessed and used within the determination of planning applications.	Clarification can be added to address this concern.	Yes	R063	Bywater Homes

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Q11	The Reg 18 wording used 30% as the area of garden to be retained. The Reg 19 changes have shifted to 30sqm. The previous approach allowed greater flexibility.	This was done to unify the space standard requirements in H5. The wording can be amended to make this clearer.	Yes	R026	James Burton
Q13	Remove reference to viability in consideration of cycle parking provision on / off-site and adopt a more flexible approach to using highway space.	The policy can be amended to remove reference to viability, but retain emphasis to on-site provision. This policy is intended to cover small sites where it is not physically possible to provide on-site parking. We do not wish to construct a policy that allows larger developments to avoid providing cycle parking on-site. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
Q13	Add reference to London Cycling Design Standards.	Agreed, this reference can be added. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
Q13	Cycle parking standard for student accommodation is considered excessive.	Cycle parking standards are set by the London Plan and the council does not consider that a local standard is appropriate in this case.	No	R046	Unite Students
Q14	In para c (i) it would be better to define the retained garden space in square metres, based on policy H5, rather than a percentage basis. As presently worded, there is a strong incentive to remove the "host" building to maximise housing gain.	The optimisation of sites is a policy objective. There is no policy presumption to retain existing buildings. The square metre requirement of H5 is repeated in Q14 (c)(ii) to ensure standards are maintained.	No	R066	Brixton Society
Q19	It is requested that reference be made to the weight that can be given in decision making to the public benefit of Trust proposals on the St Thomas' Hospital site.	Public benefit is established as a decision-making consideration in the NPPF. Proposals for the St Thomas' Hospital campus will be assessed on their merits against the relevant policies at the time of assessment. It is only at that time that public	No	R069	Guy's & St Thomas' NHS Foundation Trust

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		benefits can be properly considered as they are by definition scheme-specific.			
Q20	The requirement that all new windows in listed buildings should be single glazed is unjustified.	Clarification can be added to address this concern.	Yes	R014	Crispin Royle-Davies
Q24	The reference in part (d) is a repeat of part (a)(x) and causes ambiguity.	Agreed, there is unnecessary repetition. Q24 (a)(x) can be deleted.	Yes	R020	Port of London Authority
Q25	Asks for co-operation when preparing the Local Views SPD.	This will be done. See also the statement of common ground between the two boroughs (SCG08) and appendix 1 of the Duty to Cooperate Statement of Compliance (PD07).	No	R034	LB Southwark
Q25	Croydon would strongly object to any development in Croydon being constrained purely because it is contained in a panorama designated by the Draft Revised Lambeth Local Plan.	The views in question are long established – they were in Lambeth’s Unitary Development Plan (2007) and are policy in the current Lambeth Local Plan (2015) (SD01). Both views are panoramas from elevated viewpoints. New development should not automatically be considered harmful, indeed it may enrich the view. For example, central Croydon’s towers are already a landmark. The forthcoming Local Views SPD will explore this in detail and Lambeth will engage with Croydon on this. This matter was addressed in the statement of common ground between the two boroughs (SCG05).	No	R062	LB Croydon
Q25	Ask that no new views are added to the Local Views SPD.	The SPD will only provide advice on the views listed in Policy Q25 and will not introduce new views.	No	R069	Guy's & St Thomas' NHS Foundation Trust
Q26	Add a reference to the weight that can be given in decision-making to the public benefit of Trust proposals on the St Thomas’ Hospital site.	Public benefit is established as a decision-making consideration in NPPF. St Thomas’ Hospital proposals will be assessed on their merits against the relevant policies at the time of assessment.	No	R069	Guy's & St Thomas' NHS Foundation Trust

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Q26	The definition of tall buildings in Policy 26 is contrary to NPPF para 11. The heights in 10.147 are ambiguous when read in conjunction with the Mayor's threshold heights.	There is no conflict with the presumption in favour of sustainable development as set out in para 11 NPPF or the London Plan because the policy takes a positive approach. The Mayor of London has raised no issue with this policy.	No	R042	Gerald Eve for Kessler (SLR) Limited
Q26	Para 10.147. North of the South Circular Road any building rising more than 15m above ground level will be prominent in this context and should therefore be treated as a Tall Building. The "mid-rise" category should be deleted.	The London Plan definition of a tall building is one that is 'substantially taller' than its context. It is considered that 15m+ is substantially taller than the prevailing context. A 'midrise' category is essential to reflect those schemes that are taller than their context but not substantially taller.	No	R066	Brixton Society
Q26	Limiting the number of tall building locations in the Opportunity Area does not accord with London Plan Policy GG2.	The approach taken to the VNEB area is set out in the Topic Paper 8 (TP08) and has the support of the Mayor of London.	No	R042	Gerald Eve for Kessler (SLR) Limited
Q26	Part b) undermines the plan-led approach to tall building development. It should be removed as it does not align with London Plan policy D9.	Lambeth's justification for this approach, which is supported by the Mayor of London, is set out in Topic Paper 8 (TP08).	No	R022	Historic England
Q26	Part b) requirement for a 'clear and convincing justification' is ambiguous as it is not defined.	The issues to be addressed in a clear and convincing justification are set out in the policy wording in part (b).	No	R042	Gerald Eve for Kessler (SLR) Limited
Q26	In parts a)(iv) and b), more consideration should be given to the situation where two or more tall buildings are being proposed close together, perhaps by different developers. Key issues are daylight, overshadowing and mutual privacy. If there are already relevant policies elsewhere in the Plan, cross references should be provided here.	Other local plan policies will apply and do not all need to be cross-referenced. Amongst others, policies Q1, Q2, Q3, Q5, Q6, Q7 (i), (iii), (iv), (v), (vi), (vii) and (viii), (x) Q8, and Q9 will also be of relevance when assessing tall buildings proposals.	No	R066	Brixton Society

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Q27	In part e)(iv), the use of open basement areas with railings or balustrades is preferred for Victorian properties.	Not all Victorian properties are characterised by basement development. The Lambeth Local Distinctiveness Study (EB75) explains this. It cannot be assumed that a railing enclosure in a front garden will always be an appropriate response.	No	R066	Brixton Society
Q27	The requirements in parts d) and e) are onerous, inconsistent with the London Plan, and not justified for non-residential.	The issues with basements addressed in parts (d) and (e) apply to all uses. The Mayor has raised no issue of inconsistency with the London Plan.	No	R077	London Hotel Group
Section 11 – Places and neighbourhoods					
PN1	Paragraph 11.1 - the target number of homes and jobs remains the same as those first set for the Opportunity Area in 2007 so is out of date.	The figures are consistent with those in London Plan.	No	R040	Waterloo Community Development Group
PN1	Paragraph 11.3 - The designation of the South Bank and Waterloo Neighbours by both boroughs should be emphasised.	A reference to the neighbourhood area being cross-border can be added to the supporting text.	Yes	R034	London Borough of Southwark
PN1	Paragraph 11.4 should recognise Oasis as a stakeholder in and that the South Bank Partnership Manifesto does not fully reflect the residential community's aspirations.	Paragraph 11.4 can be amended to acknowledge these points.	Yes	R040	Waterloo Community Development Group
PN1	Paragraph 11.7 - the purpose of PN1 should be protecting the existing community and growing the residential community and its social infrastructure. The need for affordable housing is not adequately recognised. Reference to Doon Street should be removed from the supporting	The policy and supporting text have been prepared through engagement with stakeholders and two rounds of public consultation. The policy sets out the priorities for the area and needs to be in general conformity with the London Plan, including Waterloo's location in the Central Activities Zone and the Opportunity Area. As set out in part (vi)	No	R040	Waterloo Community Development Group

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	text. Reference to the Johanna school site, the vacant housing sites owned by Coin Street and the Royal Street site should be added.	the council recognises the residential character of the area. Paragraph 11.7 acknowledges that the eastern area of Waterloo offers development opportunities for appropriate uses, including housing. Concerns about affordable housing in Waterloo are well understood and are acknowledged in paragraph 11.7. London Plan and Local Plan policies for affordable housing will apply in Waterloo as they do in all parts of the borough. The sites listed are those currently in the planning pipeline.			
PN1	Paragraph 11.10 – Add reference to making maximum use of provisions in policies D4, EN1 and ED13 to secure planning obligations to mitigate pressures on the management and maintenance of public realm and open space.	Clarification can be added to paragraph 11.10.	Yes	R040 R074	Waterloo Community Development Group Jubilee Gardens Trust
PN1	Paragraph 11.12 - 'car trips' should be changed to 'vehicle trips' to more accurately reflect the likely growth in servicing, taxi and PHV movements rather than car movements.	'Car trips' can be amended to 'vehicle trips'. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
PN1	Not aware of any other sites available for open space. The policy should encourage open spaces on terraces on roofs, provided they are open to the public.	Improvements to and the expansion of existing open space will be supported and may also be delivered through new developments. See also policy EN1 and green infrastructure policies in the South Bank and Waterloo neighbourhood plan.	No	R040	Waterloo Community Development Group
PN1	Public realm needs improving across the neighbourhood and should be based on	The text can be amended to acknowledge the use of public realm by residents.	Yes	R040	Waterloo Community Development Group

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	residents' needs for space for recreation, sport and play.				
PN1	The policy should include support for the redevelopment and reconfiguration of the King's Hospital Site through the preparation of a masterplan.	The council wishes to work proactively with the King's College Hospital Foundation Trust on plans for their estate, through a masterplan approach. Policy PN1 relates to Waterloo and South Bank, but reference to the Denmark Hill estate can be added to the supporting text to PN10, given the location of the hospital.	Yes	R024	ID Planning for King's College Hospital Foundation Trust
PN1	Part (b) - It is not clear what the long term place-making objectives are.	The long term place-making objectives for the area are set out in PN1 and its introductory text.	No	R040	Waterloo Community Development Group
PN1	Part (c) - A3 uses in Lower Marsh do not need protection or encouragement. 'Original' needs clarifying.	This is consistent with the made South Bank and Waterloo Neighbourhood Plan. As set out in paragraph 6.59 of the DRLLP PSV, this refers to ground floor units as originally constructed.	No	R040	Waterloo Community Development Group
PN1	Part (c) - the Lower Marsh/The Cut/Leake Street Special Policy Area should be renamed as the Waterloo Retail Cluster. Policies should exclude national corporations, cap business rates for independent businesses and should support temporary changes of use.	The CAZ retail cluster and Special Policy Area are separate designations. The identification of the Lower Marsh/The Cut/Leake Street Special Policy Area recognises the special character of the area and enables a specific policy approach to help protect the independent nature of the area. See section 2 of Topic Paper 4 (TP04). Business rates are separate to the planning system and cannot be addressed through planning policy. The council supports national corporations in Waterloo given its location within the Central Activities Zone and the economic benefits delivered through investment by these businesses. Temporary change of uses can be delivered through relevant permitted	No	R030	WeAreWaterloo Business Improvement District

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
		development rights or temporary permissions where appropriate.			
PN1	Clarify whether any part of the Royal Street site, including the railway arches, is included in the CAZ Retail Cluster.	No part of the Royal Street site, including the railway arches accessed from Carlisle Lane are included in the CAZ retail cluster. This precise boundary is clearer on the Policies Map.	No	R053 R067	Guy's and St Thomas' Charity Stanhope PLC
PN1	The council should consider other complementary non-office uses to ensure the most effective use of land in accordance with the NPPF.	PN1 supports a range of uses in Waterloo and South Bank, given its CAZ location.	No	R047	PPHE Hotel Group
PN1	Part (g) and para 11.12 - reference to the Waterloo and South Bank Public Realm Framework should be removed as a final copy has not been made available and it was the subject of objections.	A formal Cabinet Member decision on the Waterloo and South Bank Public Realm Framework was taken in December 2019 to agree the final Framework (EB96) following consideration of previous comments made. Stakeholders have been notified about this decision.	No	R037 R040 R072 R074	Coin Street Community Builders Waterloo Community Development Group South Bank Employers' Group Jubilee Gardens Trust
PN1	Waterloo Station, Emma Cons Gardens and Station Approach should have significant and specific focus within the Local Plan, as recognised in the Waterloo and South Bank Public Realm Framework.	Key Waterloo-specific regeneration projects are set out in policy PN1 and referenced in the supporting text to the policy. A reference to the Waterloo and South Bank Public Realm Framework has also been included to ensure that the projects identified in that document Framework are considered. The permeability to the south of Waterloo Station is addressed through part (i).	No	R030	WeAreWaterloo Business Improvement District
PN1	Part (h) - additional funding will be required for the Jubilee Gardens Trust to take on the costs of managing the extension of the Gardens. PN1 (h) is not positively prepared, justified or effective because it does not	The concerns of the JGT and the scale of its funding challenge are well understood by the Council. The issue is recognised in the Plan and appropriate references are included to allow mitigation of harmful impacts of development	No	R074	Jubilee Gardens Trust

<u>Policy, paragraph, annex or table no.</u>	<u>Main Issues raised</u>	<u>Council Response</u>	<u>Potential to change Plan</u>	<u>Respdt. unique IDs</u>	<u>Respondent names</u>
	refer to the need for revenue for the Trust to be able effectively to manage it; and unsatisfactory provision for management and maintenance will affect the deliverability of the extension to Jubilee Gardens. Include a reference to enabling development to support maintenance of the extension to Jubilee Gardens.	through planning obligations, in accordance with the statutory tests governing their use. It is not necessary to cross reference the other sections of policy on planning obligations because these will automatically apply. The policy must balance all considerations and it is important that it does not limit potential for delivery of development on the one third of Hungerford car park, given the many constraints affecting that site and the many years it has remained undeveloped.			
PN1	Part (h) – servicing arrangements and the need for supporting infrastructure are not adequately referenced, including potential for grey water recycling.	The wording of part (h) can be amended to make clearer the importance of servicing arrangements (including for sustainable watering) and to acknowledge the potential for supporting infrastructure subject to other policies on MOL and open space. In addition, the wording already in para 11.16 means the relationship between proposals for supporting infrastructure and the need to maintain Jubilee Gardens can be explicitly considered.	Yes	R074	Jubilee Gardens Trust
PN1	Part (h)(vi) is erroneous and unsound. Delete "and from the Belvedere Road viaduct arch towards Jubilee Gardens". The view from the Belvedere Road viaduct arch towards Jubilee Gardens is substantially blocked. Only by looking directly along Belvedere Road are the Gardens glimpsed in the distance, by virtue of a curve in the road. The effect of this paragraph is to set the front of any arts building back from	The objective is to optimise connectivity between the MOL and the wider street network both physically and visually. The approaches from the north are particularly important as pedestrians on the east side of Belvedere Road can see through the railway bridge space towards Jubilee Gardens: this visual connection is essential. The part of MOL reaching northwards towards the viewer in the high foot-fall area where Concert Hall approach meets Belvedere Road will entice people towards the	Yes	R040 R045 R065	Waterloo Community Development Group Friends of Jubilee Gardens M Evers

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	<p>Belvedere Road, leaving an area of MOL in front which is too small for recreation or relaxation and reduces the useful area of park by 10%, which in turn will lead to more crowding on the remainder.</p> <p>The present proposed boundary between arts building and MOL was made after the period for public consultations had ended and hence it has not been possible to raise concerns earlier.</p>	<p>MOL. Without this, the building line would come forward blocking the view and disconnecting the MOL. To clarify the meaning, the wording can be amended to read "through the Belvedere Road railway bridge" rather than "from the viaduct arch".</p> <p>There are many, complex planning constraints affecting the development of the one third of Jubilee Gardens. The site has remained undeveloped for several decades, in part owing to these difficulties. The Local Plan must take a policy approach that has regard to deliverability to achieve soundness. The previously proposed MOL boundary change received objections from the prospective developer of the site during the Regulation 18 consultation. The Council has therefore had regard to these concerns and the current proposal shows an area that has potential to be developed whilst also addressing the various planning constraints. The adopted and previously proposed areas could not achieve this. The proposal is therefore positively prepared and is supported by the Southbank Centre, a key stakeholder in any future development proposal.</p>			
PN1	<p>Part (h) last sentence - The existing public toilets are not on the land leased to the Jubilee Gardens Trust and known as Jubilee Gardens. Amend the last sentence of part (h) to ensure it does not lead to the presumption that those responsible for the</p>	<p>The requirement for ongoing provision of public toilets is reasonable given the level of usage of the Gardens. Their current location is intended to become part of Jubilee Gardens.</p>	No	R040 R065	Waterloo Community Development Group M Evers

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	management of Jubilee Gardens once extended must provide a public convenience/public loos.				
PN1	Part (i) - coaches should be discouraged and managed.	Part (i) can be amended to refer to motor vehicle trips rather than car trips.	Yes	R040 R065	Waterloo Community Development Group M Evers
PN1	Part (l) - reference to Greenways should be amended to reflect they are emerging.	Part (l) adequately reflects the delivery of greenways, along with the SoWN neighbourhood plan itself which is part of the development plan for Lambeth.	No	R030	WeAreWaterloo Business Improvement District
PN1	Part (k) - the residential community does not support the reconfiguration of the IMAX roundabout and there is insufficient rationale for this.	Part (k) acknowledges the potential for regeneration of the area. Specific proposals will be considered on a case by case basis and will be subject to public engagement and consultation.	No	R040	Waterloo Community Development Group
PN1	Part (k) - the policy should recognise the importance of retaining the IMAX in its current location or should ensure any reprovision of a cultural facility on the site meets the BFI's cultural and regeneration objectives.	There is insufficient information to consider whether the policy should be specific about the cultural use to be re-provided on this site. The wording as drafted is considered sound.	No	R013	Tulley Bunting for BFI
PN1	Part (m) - the reference to an agreed high-level masterplan may delay the development proposals for Royal Street. Reference should be made to 'agreed high-level design principles' or 'the principles of the high-level masterplan' and the proposed land uses should not be limited to those set out in the draft policy.	To clarify, the reference can be amended to 'agreed high-level design principles'.	Yes	R053 R067 R069	Guy's and St Thomas' Charity Stanhope PLC Guy's and St Thomas' NHS Foundation Trust

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PN2	The policy should recognise that housing can be delivered through a range of housing products.	This is recognised throughout the plan and particularly in Section 5 Housing.	No	R059 R061	Turley for Alumno Turley for Olympian Homes
PN2	Part (d) should include reference to retail and leisure uses so that the ambition of an 'active spine' can be realised.	The policy does not preclude other uses coming forward in the arches but proposals would need to do so in accordance with other policies in the development plan.	No	R055 R056	Arch Company Network Rail
PN2	Part (i) – reference to changing the Durham St triangle to a two-way system. If further work was to be carried out on this option, we would want to prevent any negative impacts on the design of the Vauxhall Cross scheme.	Noted. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
PN2	Factual updates should be made to the supporting text in relation to Vauxhall Park.	The text can be amended to include this update.	Yes	R066	The Brixton Society
PN2	Please amend the opening date for the Northern line extension from 2020 to Autumn 2021 in Paragraph 11.18 and 11.31.	This amendment can be made. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
PN3	The policy seeks to restrict uses through a percentage threshold which is not consistent with national policy, effective or justified. Rework to reflect the encouragement of evening and night-time economy uses within the evening economy management zone and encourage A, D and B uses in the town centre outside of the PSA, indoor markets and evening economy management zone.	The policy approach is consistent with the NPPF which requires planning policies to define the extent of town centres and primary shopping areas and to make clear the range of uses permitted in such locations. PN3 is clear the range of uses permitted in each part of the town centre. The threshold approach to uses is a long-established policy approach in both adopted Lambeth Local Plan policies and other Local Plans. PN3 (c) seeks to support the growth and diversification of the evening and night-time economy whilst managing	No	R055 R056	Arch Company Network Rail

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		its impact on local residents and the local environment.			
PN3	Make clear how the target percentages for different uses will be calculated in (a), (c) and (d).	Clarification on this point can be added to part (d).	Yes	R066	The Brixton Society
PN3	Part (b) - The proportions of A1 and A3 uses should be measured and controlled on a total unit basis, as opposed to exact floorspace. If the floorspace approach is carried through, this should relate to the ground floor to ensure flexibility is maintained. Also clarify that A4 uses would only be restricted on ground and upper floors. It is also understood that parts (c) and (d) do not apply to the indoor markets.	The measure is floor-space rather than units to ensure a range of unit sizes are maintained in each use, particular A1 units. A management plan for the markets has been secured through planning applications 19/00559/FUL and 19/00560/FUL, reflecting this approach. The approach to protecting independently accessed B1 and D1 uses on upper floors is consistent with Local Plan policies ED1, ED4 and S1. The wording on A4 uses is considered to be sufficiently clear. Parts (c) and (d) do not apply to the Indoor Markets.	No	R076	DP9 for Hondo Enterprises
PN3	Workspace provision in the Creative Enterprise Zone should make provision for messy or noisy uses, including manufacturing rather than undifferentiated A1/B1 space as potential business tenants have a wider range of needs, which are not always compatible with residential use above.	Part (e) requires developments to maximise the amount of market, flexible, low-cost and affordable workspace suitable for creative and digital industries and also provide a mix of workspace typologies. With relevance to the consideration of co-location of workspace and residential uses, Policy Q2 requires the consideration, management and mitigation of adverse amenity impacts on residences and consideration of the agent of change principle.	No	R066	The Brixton Society
PN3	Consideration should be given to suggested amendments to ED6 in relation to uses in railway arches.	See response to comments on ED6.	No	R055 R056	Arch Company Network Rail

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PN3	Reference to the railway arches stretching from Pope's Road to Gresham Road in paragraph 11.43 should be removed.	This is a factual statement on the importance of these arches and their contribution to the Brixton Creative Enterprise Zone. It should remain.	No	R055 R056	Arch Company Network Rail
PN3	Part (k) should include some public car parking, in order to attract a broader range of shoppers to Brixton and part (s) should retain the supermarket use in any development.	Part (k) relates to the wording in Site Allocation 15. Proposals involving retail uses will be assessed under the relevant policies in Section 6 of the plan, in addition to PN3.	No	R066	The Brixton Society
PN3	Part (o) - improve connections between Brixton's mainline and London Underground stations. We would welcome hearing more from the council to understand how these aspirations will be achieved, taking into account how increased demand may impact station and Victoria line capacity.	Noted. This is covered in the statement of common ground with the Mayor (SCG01).	No change.	R048	Transport for London
PN3	Part (p) aspirations to reopen the rear entrance to Brixton tube station. We are not sure what entrance Lambeth are referring to. We would welcome clarity on this point and further discussion if the council wish to retain this aspiration.	The entrance referred to is from Electric Lane. The council wishes to retain this reference and welcomes further discussion with TfL about how this aspiration can be achieved. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
PN3	Numerous references are made to a potential cycle lane between Atlantic Road and Electric Lane but this scheme has made limited progress to date and we would encourage the council to further engage with us to discuss this in more detail.	The provision of additional and improved cycling infrastructure in the town centre remains a key objective for the council, in line with the opportunities created by the Brixton Liveable Neighbourhood project. We welcome the opportunity for further discussion about how a cycle hub could be delivered in Brixton in line with PN3. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London

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PN3	Part (r) references the delivery of the Streatham to Oval cycle way through the town centre. This is a large, complex scheme and is subject to approvals, so it may be beneficial to nuance the text.	This is the case with all major projects but the text can be amended to reflect this. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
PN3	Seeking contributions to the delivery of a new mainline station and public realm improvements needs to be reasonably and proportionately imposed. More clarity should be provided on the hierarchy, scope and specific content of the obligations and the methodology for calculating financial contributions.	Planning obligations will be sought on a case by case basis, in accordance the statutory tests governing their use. This will include consideration of the relationship between a development and the station, the impact of increased trips on the public realm and useage of the station, and the extent to which these impacts may need to be mitigated.	No	R055 R056	Arch Company Network Rail
PN3	Guidelines should be set for the future development of the Waterworks site. In an area of open space deficiency provision should be included for an extension of Windmill Gardens public open space and a new primary school.	The council is not aware of any information regarding this proposal and is therefore not in a position to include a reference in the Local Plan. Requirement for schools are set out in the Infrastructure Delivery Plan (EB100).	No	R066	The Brixton Society
PN6	The map on page 422 needs to include the whole of the Stockwell Park conservation area.	The map on page 422 is indicative. The actual conservation area boundary is shown on the Policies Map.	No	R025	Stockwell Park Residents' Association
PN6	Positive action and measures should be taken to improve air quality, reduce noise pollution, discourage through traffic, replace street trees and increase electric charging points.	These matters are covered by other policies in the development plan. Paragraph 11.91 recognises poor air quality as an issue in Stockwell and the approach to addressing it.	No	R025	Stockwell Park Residents' Association

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PN6	Buildings in conservation areas should be allowed to have solar panels on the roof so long as they do not harm the historic setting and maintain the character of the streetscape.	Policies relating to climate change mitigation and adaptation and heritage assets are set out in sections 9 and 10 of the DRLLP PSV.	No	R025	Stockwell Park Residents' Association
PN6	Slade Gardens should be included as a Metropolitan Open Space as it is a very popular and much needed recreational open space.	Slade Gardens is fully protected as open space by EN1 of the Local Plan. Metropolitan Open Land is designated at London Plan level.	No	R025	Stockwell Park Residents' Association
PN6	In accordance with part (e) TfL is keen to work with the council to reduce road severance.	Noted. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
PN7	Factual updates should be made to the supporting text.	Some factual updates can be made.	Yes	R027	Norwood Action Group et al
PN7	The primary shopping boundary adjacent to and within Site 18 is incorrect on the map.	The boundaries on the map are correct and consistent with the proposed change to the Policies Map at this location.	No	R027	Norwood Action Group et al
PN7	Part (c) - suggest a focus on the wider benefits that the scheme is aiming to deliver, rather than 'two-way working' specifically. Other options to improve safety, cycling, walking and buses should also be considered, and we would like to work with the council to identify the most feasible and effective option.	The wording of (c) can be amended to reflect this. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
PN8	Amend the opening date for the Northern line extension to Autumn 2021 in para 11.19. Add 'potential' to references to planned cycle routes.	These amendments can be made. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London

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PN9	Tying numbers of arches to specific uses/percentages and indeed percentages is wholly unrealistic in these market conditions. This is not consistent with national policy, effective or justified.	The policy approach is consistent with the NPPF which requires planning policies to define the extent of town centres and primary shopping areas and to make clear the range of uses permitted in such locations. PN9 is clear on the range of uses in the town centre. The threshold approach to uses is a long-established policy approach in both adopted Lambeth Local Plan policies and other Local Plans.	No	R055 R056	Arch Company Network Rail
PN9	There is a neighbourhood plan boundary but no forum to oversee it. The Herne Hill neighbourhood area should not include any part of SW2 or Coldharbour Ward.	The boundary of the Herne Hill neighbourhood area was agreed by Cabinet in December 2017. Amendments to the neighbourhood area boundary cannot be made through the Local Plan and can only come forward through the neighbourhood planning process.	No	R066	The Brixton Society
PN9	The Local Plan does not mention Herne Hill. The council should cooperate with Southwark to help the struggling areas. There are issues with vacant units, rubbish and traffic and a deterioration in the quality of public spaces and roads. There should be better co-ordination between the council and with Network Rail.	Policy PN9 relates specifically to Herne Hill. It has been reviewed to ensure the aspirations for Herne Hill are up to date. The policy continues to support the role of Herne Hill as a small community-focused district centre. PN9 will be applied alongside all the other policies in the Plan to support sustainable growth in Herne Hill. The Council has ongoing discussions with LB Southwark around cross-border cooperation and also seeks to work with Network Rail.	No	R084	Catherine James
PN10	Loughborough Junction Action Group and Loughborough Junction Neighbourhood Forum were unable to comment on the draft policy before it was published. A number of changes to the supporting text and policy are requested.	LJAG/LJNF comments in response to Regulation 18 consultation informed the draft policy text as shown in Appendix 1 of the Draft Revised Lambeth Local Plan October 2018 Consultation Report (December 2019) (SD16a). Some further minor	Yes	R028	LJAG/LJNF

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		amendments can be made in response to the Regulation 20 comments.			
PN10	The council has confirmed that previous development proposals for the Marcus Lipton, Grove Adventure Playground and Elam Street Open Space sites are no longer being considered. Text should be added to specifically protect these sites.	Part (b) can be amended to clarify the inter-relationship between this place-specific policy and borough-wide policies S1 and EN1 that would also apply.	Yes	R028 R032 R066	LJAG/LJNF Loughborough Junction Neighbourhood Forum The Brixton Society
PN10	The policy should refer to improvements to public realm outside of the Hero of Switzerland public house.	The improvements to public realm have been secured via a planning consent, subject to s106 (ref 19/01481/FUL)	No	R029	ROK Planning for UDN Redevelopment
PN10	Text could be added at the end of paragraph 11.143 to read: 'Expansion of London Cycle Hire will be explored with TfL, to be funded by new developments in the form of developer contributions.'	This reference can be added to 11.143, but using "to be funded <i>through</i> developer contributions" (emphasis added) because funding may come from existing developer contributions (e.g. CIL) rather than just from new developments. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
PN10	We urge greater caution around the promotion of the use of car clubs in this area (which is PTAL 5) unless they are more directly linked to measures that discourage private ownership.	See response to Transport for London's comments on T7 regarding car clubs. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
PN10	The type of uses to be encouraged in this area are supported, however tying numbers of arches to specific uses and percentages is not effective or justified.	This policy is appropriate to address the specific needs of the railway arches in this location, in combination with other policies in the development plan.	No	R055 R056	Arch Company Network Rail
PN10	The wording in PN10a)(vi) is too reactive and it seems that only proposals that do obvious harm will be resisted.	The existing wording is appropriate to ensure proposals do not harm accessibility in the town centre.	No	R066	The Brixton Society

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PN11	Paragraph 11.152 should reference the Bromley Local Plan 2019 as identifying Crystal Palace Park and station as a Strategic Outer London Development Centre rather than the London Plan.	Agreed, this is an error. Paragraph 11.52 can be amended to reference Bromley's Local Plan.	Yes	R015	London Borough of Bromley
PN11	Reference to a Tram extension should be removed from the policy text and scheme map, as this scheme is unlikely to be developed.	We acknowledge that TfL is not actively pursuing the extension of the Tram network to Crystal Palace, but this remains an aspiration for the council and has been included at the request of the London Borough of Croydon. The reference can be amended to reflect a degree of uncertainty. This is covered in the statement of common ground with the Mayor (SCG01).	Yes	R048	Transport for London
<b>Site allocations</b>					
Site 1	Site allocation should be amended to reflect latest information on land ownership, current uses and buildings for retention.	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R053 R067	Guy's and St Thomas' Charity Stanhope PLC
Site 2	Although proposed for deletion as an allocation for educational use this site has potential for allocation for up to 55 residential units.	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R081	Notting Hill Genesis
Site 5	A requirement for this site to provide step-free access to the Bakerloo (northbound) and Northern line platforms should be included. A new bullet point under Design Principles and Key development considerations should therefore be added to read:	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London

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	'Facilitates step-free access improvements to Waterloo station'				
Site 9	Site allocation should be amended to reflect latest position including London Plan policies on office developments and removal of garden bridge reference in part (viii).	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD. The TfL comment is covered in the statement of common ground with the Mayor (SCG01).	No	R020 R080 R048 R039	Port of London Authority MEC London Property Transport for London Harrison Homes
Site 9	There is a confirmed need for a nursing home in the vicinity which should be taken forward within an amended site allocation.	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R039	Harrison Homes
Site 10	Site allocation should be amended for consistency including reference to the resolution to grant, its appropriateness for a taller building, and reference to the KIBA designation.	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD. However, see the response on Annex 11 in relation to appropriateness for tall buildings. The council has also agreed a statement of common ground with the Mayor to respond to his comment (SCG01).	No	R019 R052 R054	U & I Group PLC London Fire Commissioner Mayor of London
Site 11	Intend to make representations on the Site Allocations DPD focussing on type of residential uses and NPPF definitions of deliverable and developable	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R061	Turley for Olympian Homes
Site 13	The boundary of Vauxhall Island Site is incorrect in the map for Site 13 as it includes the bus station area. This should be corrected to depict the correct site area as this might raise issues that were	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London

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	previously addressed about the links between the bus station and developer.				
Site 13	Welcome site allocation but suggests should state that the Vauxhall gyratory requires significant reconfiguration, which will unlock the Vauxhall North site as a significant development opportunity and should be allocated.	Site allocations are not being amended or proposed as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R041	TfL Commercial Development
Site 16	Mapping corrections relating to the position of Brixton Underground Station required in relation to the existing site allocation.	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD. This is covered in the statement of common ground with the Mayor (SCG01).	No	R048	Transport for London
Site 18	Site allocation factually incorrect and out of date in relation to the planning history, site boundaries, current uses and heritage assets.	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R027	Norwood Action Group et al
Additional site allocation	Desire for an additional site allocation at Guy's and St Thomas' Hospital	New site allocations are not being proposed as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No	R069	Guy's and St Thomas' NHS Foundation Trust
<b>Annexes</b>					
Annex 10	PPG encourages the use of standardised or formulaic approaches to assess the impact of development for planning obligations to fund a project that is directly related to a specific development. Paragraph 11.1.37 of the DLP ItP advocates the use of the HUDU Model. Therefore, Annex 10 should include a separate section on 'Monetary	PPG encourages use of standardised or formulaic approaches in assessing need for infrastructure. DLP ItP para 11.1.37 refers to the HUDU model in the context of infrastructure planning. HUDU and the CCG contributed to the content of the IDP (EB100), which identifies the healthcare infrastructure required to support growth over the plan period. DRLLP PSV paragraph 7.19 (under	No	R036	HUDU for CCG

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	Contributions in lieu of on-site social infrastructure' linked to Policy S2(d), making reference to the HUDU model for health contributions.	Policy S2(d)) explains that the need for developer contributions will be considered in light of evidence of existing social infrastructure and the IDP, and that payments in lieu will be calculated on a case by case basis in light of this evidence. It is therefore not appropriate to include a formula for this in Annex 10.			
Annex 10	Affordable workspace - approach set out within Annex 10 is too restrictive and does not allow the valuer to take site specific or other methodological approaches including reference to yields. There is also no proposed CIL exemption and other costs such as zero carbon all will influence viability.	This approach set out within Annex 10 has been developed with viability consultants and is considered to take account of all relevant factors in relation to payments in lieu. The affordable workspace policy (which includes this exceptional PIL provision) has been tested for viability alongside other policies and developer contributions (EB98, EB99).	No	R067	Stanhope PLC
Annex 10	Impact of visitor attractions - the approach as set out within Annex 10 which identifies that the contributions will be "based on impact in relation to 1% of turnover, or another sum as agreed" rather than on any true costs is not justified.	This is the adopted approach in the Local Plan 2015. Experience shows this an effective approach to assessing the value of the impact of visitor attractions, reasonably related to the value generated by the operation of the facility. Allowance is made for an alternative approach through the reference to "or another sum, as agreed".	No	R019	U and I Group PLC
Annex 11 – Vauxhall	All three parcels of the 8 Albert Embankment site were previously identified as being "sensitive for tall buildings". The Central site is now identified as suitable for buildings of up to 90m AOD. The West and East Sites do not fall within the area identified for buildings of up to 90m AOD.	The Annex 11 map is correct. The Vauxhall and Albert Embankment Tall Buildings Assessment (EB85) and Topic Paper 8 (TP08) support the Council's position that no part of the 8 Albert Embankment site is suitable for tall buildings development.	No	R019	U and I Group PLC

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	U+I supports the change. This needs to be recognised in Annex 11, Vauxhall plan and an additional inclusion in the specified Locations list set out below it.				
Annex 11 – Waterloo Map	The height on Location W2 (Doon Street) should be increased in height to 144.3mAOD to reflect the implemented permission and referred to as a site under construction.	As explained in the Waterloo Building Height Study (EB86) and the Westminster World Heritage Site Setting Study (EB77), the height for Location W2 in Annex 11 is the 'no heritage harm' height. The implemented permission was granted under a previous policy regime and in the context of relevant planning considerations.	No	R037	Coin Street Community Builders
Annex 11 – Waterloo Map	In table in 10.147 the tall building threshold is 45m in North Lambeth (covering the St Thomas' Hospital site). Can it be raised to 60m on the (1) the hospital campus or (2) on Gassiot House, St Thomas' House, the land outside A&E and the vacant space outside Lambeth Wing?	These locations would be considered under part b) of Policy Q26. This northern part of the hospital site sits within London View Management Framework View 26(B) (EB87) where they are visible immediately next to the Elizabeth Tower. The buildings are also in the Albert Embankment Conservation area. The adjoining County Hall is also Grade II* listed.	No	R069	Guy's & St Thomas' NHS Foundation Trust
Annex 11 – Brixton map	Other parts of Brixton town centre should be considered appropriate for tall buildings	Most of Brixton Town Centre is a conservation area (designated heritage asset) and the tall building evidence has concluded that it is not characterised by tall building development. The justification for the approach is set out in Topic Paper 8 (TP08).	No	R055 R076	The Arch Company Hondo Enterprises
Annex 14	The Strategic Areas of Regeneration should be deleted. The purpose of the map is not clear and there is no key of the shaded areas.	The Strategic Areas of Regeneration are consistent with those identified in the London Plan. As set out in paragraph 11.4 of the DRLLP PSV, the council's regeneration objectives for these areas are referred to where relevant and include socio-economic regeneration, not just physical improvements. The	No	R066	The Brixton Society

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		key defines the shaded areas as Strategic Areas of Regeneration.			
Glossary					
Definition of 'Major Development'	Clarification required in the glossary definition of 'Major Development', include changes of use to existing floorspace comprising 1,000 square metres or more.	The definition of 'major development' is set out in Part 1 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.	No	R055	Arch Company Properties LP
Proposed Changes to the Policies Map					
Table 2	All or part of an existing KIBA should be de-designated as not justified.	The evidence base supporting the proposed approach is set out in the Review of KIBAs (EB24), with explanation of the approach in the supporting text to Policy ED3.	No	R001 R019 R051 R052	Engineering Force Ltd U and I Group PLC Workspace Management Ltd London Fire Commissioner
Table 2	Object to the deletion of Waterworks Road KIBA	Waterworks Road is not proposed to be de-designated but is identified as having potential for industrial intensification and co-location with residential (see EB24 Review of KIBAs).	No	R066	Brixton Society
Table 3	Object to a proposed new KIBA designation as not justified.	Justification for the proposed approach to these KIBAs is set out in the Review of KIBAs (EB24) and the supporting text to ED3	No	R056 R079	Network Rail Acoustic Group
Table 4	It is unclear if the intensification of these KIBAs is expected to deliver additional industrial capacity or simply to allow co-location with residential development.	Lambeth has agreed a statement of common ground with the Mayor to respond to this point (SCG01).	No	R054	Mayor of London
Table 4	Should allow co-location with residential in the Camberwell Trading Estate and adjoining sites.	The council's position and evidence base supporting the proposed approach is set out in the Review of KIBAs (EB24) and the supporting text to ED3.	No	R078	Caddick Developments

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Table 4	Site specific consideration should be given to the Costa Roastery site in the Southbank House and Newport Street KIBA. The site is very constrained and requires office development to make any industrial scheme viable	The council's position and evidence base supporting the proposed approach is set out in the Review of KIBAs (EB24) and the supporting text to ED3.	No	R038 R063	Andrew Sissons Consulting Bywater Properties
Table 5	The proposed changes to town centre boundaries for Brixton Major Centre and/or, Clapham District Centre, West Norwood/Tulse Hill District Centre, Loughborough Junction Local Centre are not justified.	The justification for the proposed town centre boundary changes is set out in Topic Paper 4 (TP04).	No	R055 R056 R066	Arch Company Network Rail Brixton Society
Table 5	The boundary of the Oval (Clapham Road) Local Centre should be amended to include: <ul style="list-style-type: none"> <li>• 43-59 Clapham Road</li> <li>• 68-86 Clapham Road</li> </ul>	Including 43-59 would result in the local centre crossing to the opposite side of the road – this would not be contiguous with the existing centre. Including 68-86 would also require the inclusion of 60-66 to form a contiguous boundary. These buildings are in residential use. Lambeth's objective is to consolidate rather than extend town centres, and not to add in ground floor residential uses.	No	R044 R082	Espalier Ventures and MELT Property Tucan Investments Ltd
Table 7	The proposed boundary of the Brixton Evening Economy Management Zone is too small. Ideally it should cover the whole Brixton Creative Enterprise Zone. As a minimum to protect existing residential accommodation, it must include the whole Brixton Town Centre.	The justification for the proposed town centre boundary changes is set out in Topic Paper 4 (TP04).	No	R066	The Brixton Society
Table 12	The Royal Circus Roundabout should not be designated as a new SINC. The site in its current layout and use is significantly	Assuming the principle of development is acceptable on a given site, policy EN1 (b) allows	No	R039	Harrison Homes

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	underutilised and the designation with stymie development.	development in SINC's subject to mitigation or compensatory measures being provided.			
Table 12	Windmill Gardens, the open land above the reservoir at Brixton Waterworks, and the adjacent Windmill allotments should be designated as a SINC.	This group of sites was considered in the 2018 SINC Review (EB65) and was not recommended for SINC designation because further surveys were required to assess its value. This point was not raised at Regulation 18 stage. It is not possible to change the position at this stage.	No	R066	The Brixton Society
Table 15	Map 12 could restrict potential to redevelop Gassiott House in the future. The zone proposed as 'Immediate Setting of Westminster World Heritage Site' should be reduced to the area of the hospital campus directly adjacent to the River Thames, and not encroaching onto the St Thomas Hospital Garden and beyond. In order to provide the quantum of area necessary to support the required public benefits of the development it may be necessary to adjust the Hospital Garden and provide healthcare space beneath.	The St Thomas' Garden is an important open space within the Albert Embankment CA and, because of its elevated position, one of the best public vantage points to appreciate the Westminster World Heritage Site. There is a locally important view of the WWHS from the garden (Policy Q25b (xi)). Whilst public benefits may in principle be able to provide a justification for harmful changes to that space, these are matters that can only be considered during decision-making when a planning application can be assessed on its merits.	No	R069	Guy's & St Thomas' NHS Foundation Trust
Table 15	Map 12 – request for amendment to the boundary of the Immediate Setting of the World Heritage Site at Regulation 18 was agreed at that time but has not been reflected in this map.	Accepted. This is an error and will be rectified through an amendment to Map 12.	Yes	R010	Southbank Centre
Infrastructure Delivery Plan (EB100)					
-	The cost and identified funding for Clapham Park Practice should be amended.	Accepted. The IDP (EB100) has been updated accordingly.	n/a	R036	HUDU for CCG

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-	The IDP should include a prioritised programme of schemes to match spatial areas of greatest development and the priority infrastructure identified in the plan (walking, cycling, public realm and greenspaces, youth facilities, social infrastructure). It should include management and maintenance. It is not clear why some projects are prioritised for CIL funding and not others (e.g. Bernie Spain Gardens).	The IDP is primarily to identify infrastructure to support growth in the borough over the plan period. It is not a list of all projects that could potentially be funded by CIL and does not indicate prioritisation for funding by CIL. Allocation of CIL funding takes place outside the Local Plan process. The IDP does identify infrastructure required to address Local Plan priorities including walking, cycling, public realm and green infrastructure, and community infrastructure (which covers youth facilities). Individual park improvement projects are considered within the borough-wide programme identified.	n/a	R037	Coin Street Community Builders
-	Include the need for a car pound in Lambeth or somewhere in London, and non-property related infrastructure.	The IDP is primarily to identify infrastructure required to support growth in the borough over the plan period. It is not a list of all projects that may be eligible for CIL funding, or projects requiring a site. No change to the IDP, but Lambeth is happy to discuss the points raised with the MPS, including help with identification of a potential site for a car pound.	n/a	R058	LSH for Metropolitan Police
-	GSTT wishes to receive CIL funding to support hospital development and to be exempt from CIL charges because this is identified as essential infrastructure.	The IDP is primarily to identify infrastructure to support growth in the borough over the plan period. It is not a list of all projects that could potentially be funded by CIL and does not indicate prioritisation of funding by CIL. Allocation of CIL funding takes place outside the Local Plan process. CIL exemptions are also set through a separate process.	n/a	R069	Guy's & St Thomas' NHS Foundation Trust

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-	The IDP omits plans for libraries to address population growth over the next 35 years.	Libraries are covered within the IDP (EB100 p15)	n/a	R083	Friends of Lambeth Libraries
-	The sports and physical activity strategies and action plans referenced in the IDP are out of date and do not include a Playing Pitch Strategy. Sport England wishes to support the Council in reviewing these documents to ensure a robust and up to date evidence base for the local plan in accordance with the requirements of the NPPF. The Council should made a commitment to do this.	Lambeth has agreed a statement of common ground with Sport England to address this point (SCG25).	n/a	R007	Sport England