

Appendix 1 Lambeth CAZ Article 4 Direction – summary of representations received

*Note: this table contains a summary of those responses that express a view about the making of the direction, and does not include responses confined to requests for further information/clarification as noted in the accompanying report.*

Respondent	Summary of representation	Officer Response
<p>Mayor of London</p>	<p><b>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1 999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012</b></p> <p><b>RE: Lambeth Article 4 Direction — Office (B1 a) to Residential (C3) — (Central Activities Zone (CAZ))</b></p> <p>Thank you for consulting the Mayor of London on Lambeth’s introduction of a Non-Immediate Article 4 Direction to permanently remove office (B1 a) to residential (C3) permitted development rights in Lambeth’s portion of the Central Activities Zone (CAZ) from 31 May 2019.</p> <p>The agglomeration of office functions across the Central Activities Zone (CAZ), Tech City, Northern Isle of Dogs and Kensington &amp; Chelsea play a vital economic role, supporting a large number of jobs and businesses that account for around 50 per cent of London’s output and 1 2 per cent of UK output. The CAZ boroughs contain about three quarters of London’s total office stock and over a fifth of the total in England and Wales. The conversion of offices to residential uses in this area could therefore significantly affect local amenity and the wellbeing of the area, due to loss of employment opportunities, reduced economic growth, and the loss of nationally and internationally significant businesses.</p> <p>The Mayor strongly supports Lambeth in the introduction of this Article 4 Direction so that the CAZ remains a nationally significant office location. Draft new London Plan policies 5D5 Offices, other strategic functions and residential development in the CAZ and EI Offices encourage boroughs to introduce Article 4 Directions to remove office to residential permitted development rights across the whole of the CAZ.</p>	<p>Support noted.</p>

Respondent	Summary of representation	Officer Response
	<p>The Mayor has produced strategic evidence (link below) to support Article 4 Directions - office to residential in London's nationally and internationally significant office locations.</p> <p><a href="https://www.london.gov.uk/sites/default/files/strategic_evidence_to_support_london_nationally_significant_office_locations_final.pdf">https://www.london.gov.uk/sites/default/files/strategic_evidence_to_support_london_nationally_significant_office_locations_final.pdf</a></p>	
TfL Spatial Planning	<p><b>Re: Article 4 Direction withdrawing office to residential permitted development rights (CAZ) 2018</b></p> <p><i>The comments below represent an officer level view from Transport for London Spatial Planning and are made entirely on a "without prejudice" basis. These comments do not necessarily represent the views of the Greater London Authority, nor TfL Commercial Development, who may respond separately in respect of TfL property ownership.</i></p> <p>Depending upon the location and scale of development, a change of use from Use Class B1a (Offices) to C3 (Dwellings) could result in adverse transport impacts such as additional loadings on public transport and/or a change of access arrangements/vehicle movements to/ from the Transport for London Road Network (TLRN). Clearly, these impacts would be easier to assess and control/mitigate via the planning application process, with the planning application itself being supported by a transport assessment, where appropriate.</p> <p>Similarly, compliance with relevant London Plan policy could be better achieved through the planning application process, for example the provision of an appropriate amount of suitably designed cycle parking.</p> <p>Finally, a change of use from offices to noise-and-vibration-sensitive housing could result in complaints from new residents about the effect of nearby transport operations, and the request for subsequent controls. The planning application process would allow this issue to be identified and suitable control/mitigation measures to be secured (or in extreme cases, the application refused).</p> <p>For these reasons TfL Spatial Planning supports the proposed Article 4 Direction.</p>	Support noted.

Respondent	Summary of representation	Officer Response
Individual	<p>I am writing to confirm my full support for the Article 4 Direction proposed by Lambeth suspending permitted development rights for office to residential change of use. This should have been instituted a long time ago and I have no idea why Lamberth (sic) is now waiting another full year before it will come into force. Please institute this change as soon as possible to save employment sites in Lambeth.</p>	<p>Support noted. Officers responded to the point raised and provided further explanation.</p> <p>The respondent subsequently replied:  “Thanks for the clarification - and my apologies then to Lambeth. This sounds as though it is well-timed and anticipated. Perhaps you could also extend the Article 4 direction beyond the CAZ to areas such as Vauxhall etc that are also suffering a loss of employment generating sites.”</p>
Individual	<p>As a resident of the Lambeth Central Activities Zone I am writing to let you know that I support the proposed Article 4 Direction to remove permitted development rights relating to change of use from office to residential. In an area such as North Lambeth with a mix of residential, office and industrial premises it is important that all material aspects of such a significant change of use can be taken into account to ensure the proposal does not have adverse impacts on the economy and community.</p>	<p>Support noted.</p>
Individual	<p>I strongly support the Council's proposal. Far too many offices, which provided jobs near good transport routes have been lost to accommodation which is little occupied. If there were a way to use these spaces for people in housing need then that would be my top priority. If this cannot be done then they should be used to continue to provide jobs. I am very concerned that so many people have to travel such long distances to work in London. It is a disgrace that nowadays so many of them have to form long queues at Waterloo Station to travel on even further to work. This must be very destructive of family and</p>	<p>Support noted.</p>

Respondent	Summary of representation	Officer Response
	<p>community life and individual well-being. Social and more affordable housing should be provided in London but as second best we should at least protect office space near major transport routes.</p> <p>I had noticed that some other local authorities eg Westminster were trying to prevent the loss of offices by an Article 4 Direction. I am very pleased to see that LBL is now intending to do this too.</p>	
Individual	<p>Seems to be another way of grabbing money from planning, there is a shortage of housing in London and a shortage of space, you should not stand in the way of this positive change from the government.</p> <p>Your policies are overly restrictive to the needs of the people that live within the borough.</p>	<p>Objection noted; a detailed response is set out in the body of the report at paragraph 2.7.</p>