

### Appendix 3 - Overview of 2018 consultation and summary of key changes to the DRLLP since October 2018

#### A – Overview of 2018 consultation on the Draft Revised Lambeth Local Plan

The second round of public consultation on the Draft Revised Lambeth Local Plan and Proposed Changes to the Policies Map took place between October and December 2018. The consultation resulted in 330 representations from a wide range of stakeholders, covering some 2,400 different points.

The breakdown of respondents by type is as follows:

<b>Type of respondent</b>	<b>Number</b>	<b>Percentage</b>
Individual	192	58
Tenants'/residents' association	6	2
Community group	11	3
Faith group	3	1
Neighbourhood Planning Forum	3	1
Elected politician	10	3
Representative body	11	3
Business	8	2
Business improvement district	5	2
Developer/landowner	53	16
Affordable housing provider	5	2
Infrastructure provider	11	3
Other London borough	6	2
Other statutory consultee (including the GLA)	6	2
<b>Total</b>	<b>330</b>	<b>100</b>

A number of comments addressed the strategic approach but many were detailed points about aspects of policy wording or supporting text. The issues attracting the most comment were affordable housing, affordable workspace, hotels and tall buildings. The place-specific policies with most comments were Waterloo and West Norwood. A number of comments were made in relation to specific sites.

Full analysis of the comments made is set out in the Draft Revised Lambeth Local Plan October 2018 Consultation Report. This report includes a full schedule of every comment made, officer consideration of the comment and whether or not it resulted in a change to the wording of the Draft Revised Lambeth Local Plan for inclusion in the Proposed Submission Version.

## B - Summary of key changes to the DRLLP since October 2018

A number of changes have been made to the text of the Draft Revised Lambeth Local Plan between the version made available for public consultation in October 2018 (following Cabinet agreement) and the Proposed Submission Version attached to this report at Appendix 1.

These changes have come about in response to the following:

- Comments made during the public consultation (see the schedules in the Draft Revised Lambeth Local Plan October 2018 Consultation Report for full consideration and response to the comment received)
- Recommendations made through the Sustainability Appraisal (see Sustainability Appraisal of the Draft Revised Lambeth Local Plan Proposed Submission Version for further information about the recommendations and how they have been considered and addressed)
- Changes to the Draft London Plan (DLP) during the examination process and as a result of the recommendations in the examination panel report. The DLP examination library webpage includes full information about the various rounds of changes made during the examination process. The Mayor's Intend to Publish version of the Draft London Plan December 2019 includes all of the main modifications recommended by the examination panel and accepted by the Mayor.
- Changes to the NPPF in February 2019 and ongoing updates to national Planning Practice Guidance; and changes to CIL Regulations
- Updates to infrastructure planning, including agreement of the Lambeth Transport Strategy 2019
- Inclusion of additional references to considering youth violence reduction in design
- Additional provisions to address climate change mitigation and adaptation
- General factual updates

The key changes made to the DRLLP in the PSV version are summarised below (note this list does not include every change made).

### 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

- Factual updates to reflect changes to the CIL regulations
- 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 new London Plan housing target for Lambeth, and to include reference to forthcoming Site Allocations DPD and Design Code SPD
- Policy H2 – rewrite to align fully with the DLP approach to affordable housing, including Fast Track approach on sites providing between 10 and 25 units; 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 DLP
- Policy H9 – clarification of minimum room sizes in HMOs
- Policy H11 – alignment with DLP 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 DLP
- Policy ED4 – alignment with wording in DLP 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 DLP and reference to Lower Marsh/The Cut special policy area
- Policy ED14 – clarification of the approach to managing hotels in Vauxhall; 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 DLP 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 have 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)
- Policies in emerging neighbourhood plans, particularly the draft South Bank and Waterloo neighbourhood plan which has now been made

The standard format of the PN policies has 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 has been 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 have been 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) are as follows:

- Waterloo and South Bank is no longer identified as a metropolitan town centre. Instead, PN1 reflects the DLP 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 has been 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 is also included in the Proposed Changes to the Policies Map document (resulting in no net loss of area designated as MOL).

- Reference is 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 are included in the Proposed Changes to the Policies Map document.
- Amendments to the boundary of Streatham town centre and the two primary shopping areas are included in the Proposed Changes to the Policies Map document, reflecting the recommendations of the draft 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) has been changed at the request of the Mayor of London. A reference is 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 is included in the Proposed Changes to the Policies Map document.
- The key development principles that had emerged through the partially completed Loughborough Junction masterplan have been included in Policy PN10. The policy and introductory text also 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