

Appendix 1 – key provisions in the NPPF 2018 and position in Draft Revised Lambeth Local Plan October 2018

Key provision in NPPF 2018	Position in Draft Revised Lambeth Local Plan October 2018 (DRLLP)
Local Plans must be reviewed every five years where local housing need figures change significantly.	The current Lambeth Local Plan was adopted in September 2015. It is anticipated the Revised Lambeth Local Plan will be adopted by September 2020.
A new, clearer distinction is made between ‘strategic’ and ‘non-strategic’ policies. Policies in a spatial development strategy like the London Plan are by definition strategic. “Policies to address non-strategic matters should be included in local plans that contain both strategic and non-strategic policies, and/or in local or neighbourhood plans that contain just non-strategic policies.” Plans should make explicit which policies are strategic. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.	The DRLLP includes a new Annex 13 that sets out which of its policies are strategic and which are non-strategic. The policies identified as strategic are considered to address strategic priorities for the area and/or are linked to strategic policies in the Draft London Plan.
The tests of soundness now require local planning authorities to provide 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...”. Joint working on cross-boundary strategic matters must be evidenced by a statement of common ground between neighbouring authorities.	Overall housing need in London is dealt with through the London Plan evidence and borough-level housing targets (see below). Other cross-boundary strategic matters include for example waste, gypsies and travellers, transport, social infrastructure, green infrastructure and cross border town centres. Officers have an ongoing programme of ‘duty to cooperate’ meeting with counterparts in neighbouring authorities and are working towards statements of common ground with each, to address the topics mentioned above and to be agreed in time for submission later in 2019.
A new standard method for calculating housing need is introduced. NPPF 2018 paragraph 60 states that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional	The DRLLP defers to the London-wide assessment of housing need undertaken by the GLA in the London Strategic Housing Market Assessment 2017 (London SHMA 2017). This identifies a need for 66,000 dpa across the capital between 2019/20 and 2028/29. This is not based on the new standard methodology –

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<p>circumstances justify an alternative approach...". This new standard method is intended to resolve the delays and legal challenges resulting from the variety of methods that have been used nationwide in recent years.</p>	<p>but see paragraph 3.9 in the body of the report.</p> <p>Whilst the DRLLP has to be consistent with the NPPF, it also has to be in general conformity with the new London Plan. Housing need is a strategic issue dealt with at the regional level in London, given a Regional Spatial Strategy (the London Plan) still exists in this region.</p>
<p>The new Housing Delivery Test (HDT) will be introduced for local authorities from November 2018. The HDT is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the areas, over a rolling three year period. Where the HDT indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-delivery and identify actions to increase delivery in future years.</p>	<p>The number of homes required in Lambeth in the DRLLP is the new housing target in the Draft London Plan (1,589 net additional dwelling per annum (dpa)). This will provide the basis for assessment under the HDT from the financial year 2019/20. Until then, the current 1,559 dpa target will be used. Lambeth has a good track record in housing delivery and the DRLLP anticipates the new target can be met (as shown in the housing trajectory in Annex 14).</p> <p>The borough-level housing targets are based on evidence of housing capacity in the capital set out in the London Strategic Housing Land Availability Assessment 2017 (London SHLAA 2017).</p>
<p>Ten per cent of land to accommodate the housing requirement (the housing delivery target) must be on sites of less than one hectare.</p>	<p>The GLA SHLAA 2017 identifies sites of at least 0.5ha in areas suitable for delivery of housing. The Draft London Plan also includes borough-level housing delivery targets (sub-targets) for small sites of less than 0.25ha (derived from the SHLAA 2017). Taken together these sources can be used to demonstrate that at least 10% of the land available for housing in Lambeth is on sites of less than one hectare.</p>
<p>Within the overall housing requirement for the area (housing target), strategic policies should set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern</p>	<p>The DRLLP includes indicative figures for the five designated neighbourhood areas in Lambeth, based on analysis of the SHLAA 2017 data. The figures are indicative because approximately 40% of</p>

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and scale of development and any relevant allocations.	the borough-wide housing target is assumed to come from non-identified sites so cannot be definitively attributed to specific neighbourhood areas.
There is new policy support for Build to Rent and other specialist housing formats (older people, students).	These forms of development are supported and addressed (subject to particular requirements) through policies in both the Draft London Plan and DRLLP.
The definition of affordable housing has changed to include Starter Homes, discounted market sales housing and other affordable routes to home ownership. Affordable housing for rent still includes both Social Rent and Affordable Rent, but now allows for provision through Build to Rent where the landlord need not be a registered provider.	The references to affordable housing in the DRLLP are consistent with the Draft London Plan, which is in turn considered to be consistent with the new NPPF in this respect (the Mayor's preferred affordable housing products such as London Affordable Rent and London Living Rent are consistent with the NPPF definitions).
Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. This means provision for affordable housing should not be sought from developments involving fewer than 10 residential units.	Previous Local Plan policy requiring financial contributions to affordable housing from developments of fewer than 10 units has been deleted in the DRLLP.
Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership as part of the overall affordable housing contribution from the site, unless this would significantly prejudice the ability to meet identified affordable housing needs of specific groups.	The DRLLP tenure split policy requires 70% social/affordable rented housing and 30% intermediate affordable housing. The intermediate category includes London Living Rent and London Shared Ownership, both of which are affordable home ownership products (London Living Rent enables tenants to save a deposit and landlords are expected to encourage their tenants into home ownership within 10 years). However, given the 10% requirement is of all the homes provided (not just the affordable homes), if the quantum of affordable housing achieved in a scheme is less than 35%, this national policy requirement may reduce the overall proportion of social/affordable rented housing secured below the 70% Local Plan policy requirement.
Plans should set out the contributions expected from development. This should	The Draft London Plan and DRLLP together set out the levels and types of

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include setting out the levels and types of affordable housing provision required along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.	affordable housing provision required. The DRLLP is supported by a new Infrastructure Delivery Plan (and the new Transport Strategy), which also informs the emerging new CIL charging schedule. The DRLLP sets out the approach to planning obligations in policy D4, individual topic-based policies where relevant, and Annex 10.
Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. This must be supported by an assessment of viability at plan-making stage to demonstrate that policy requirements and development contributions will enable viable development to come forward during the plan period.	<p>This is reflected in the Mayor’s threshold approach to affordable housing, which allows for a Fast Track Route where affordable housing and other policy requirements are met. In these circumstances a viability assessment is not required (though late stage review mechanisms will apply). Otherwise the Viability Tested Route must be followed.</p> <p>The DRLLP supports the Mayor’s threshold approach. The whole-plan viability assessment has tested the policy requirements and development contributions within the Draft London Plan and DRLLP (plus emerging new Lambeth CIL and Mayoral CIL) for a range of development typologies across the borough.</p>
Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity.	The references to economic growth and investment in the introductory sections of the DRLLP have been updated to reflect the council’s current position and strategy, including that in the Borough Plan. This is carried through into the economic development policies, which have been comprehensively reviewed alongside the Draft London Plan approach. There is a much clearer intent in policy to protect and increase office floorspace in the borough.
Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and	The Draft London Plan and DRLLP together address the requirements of the creative and digital industries, as well as need to retain a supply of industrial land. DRLLP policy on offices, affordable workspace, work-live, KIBAs and non-

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for storage and distribution operations at a variety of scales and in suitably accessible locations.	designated industrial land address this, along with proposed new Creative Enterprise Zones.
Planning policies should allow town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries.	Town centre boundaries and policies have been reviewed in the DRLLP with the aim of addressing this requirement, whilst retaining appropriate centre-specific policy controls (updated as required) considered necessary to sustain and manage the different circumstances in Lambeth's centres.
The new 'agent of change' principle is introduced	This is reflected in new policy in the Draft London Plan, cross-referred to in the DRLLP.

