

## Appendix 3

### Part A – Summary of the response to the Lambeth Local Plan review issues consultation October-December 2017 ('high-level summary' taken from the full consultation report)

#### Housing Growth and Infrastructure

- The majority of respondents agreed with the limited release of industrial land for mixed use development to help meet Lambeth's housing targets.
- Mixed-use developments should provide space for small businesses, take account of public transport capacity, not negatively impact on surrounding areas and provide genuinely affordable housing for social rent.
- Other respondents commented that the release of industrial land would depend on the type of land and its location. Those who disagreed with the approach argued that the protection of industrial land is important to provide jobs and that small businesses don't provide the same type of jobs as industrial land.
- Just over half of respondents supported higher density developments in town centres and locations with good public transport accessibility. Some respondents only supported high density housing if it provides affordable housing whilst others said there needs to be capacity on the public transport network.
- 35% of respondents disagreed with higher density developments on the grounds that high densities has a negative impact on quality of life, cause overcrowding, create transient communities and cannot be supported by existing transport infrastructure.
- Nearly 80% of respondents disagreed or strongly disagreed with relaxing the requirements for private gardens and balconies due to the negative impacts on health and wellbeing and quality of life. Respondents also raised concerns about the impact on the environment, existing open spaces and the importance of green spaces for improving air quality. Suggestions were also provided of alternative ways that amenity space could be provided in new developments.
- Respondents who agreed with relaxing requirements argued that occupants of some types of developments may not want their own balconies or gardens and that there are alternative ways to provide more suitable amenity spaces.
- The majority of respondents strongly disagreed or disagreed with smaller space standards for new homes as it would have a negative impact on younger people who will eventually get married and want to start a family but will not have the space to do so. Other respondents argued that it would only benefit developers' profits whilst having a negative impact on health and wellbeing and causing overcrowding.

- Some respondents commented that smaller homes may be more attractive to young professionals who do not mind living in smaller homes but it should be through choice rather than a lack of alternative affordable accommodation. Respondents who supported the proposals commented that there was a need for this type of accommodation, it is a way to meet demand for new and affordable homes and that quality of accommodation can be achieved in other ways to just the size of units.
- Of those who said that Build to Rent schemes should be supported on specific types of site or in certain locations, the most popular suggestions were areas with good public transport accessibility, town centres and where rents are affordable.
- Other respondents argued that Build to Rent should be supported borough-wide to ensure a mix of housing and to meet the need for this type of housing where there is a demand. Some respondents suggested that Build to Rent properties should be owned and managed by the council to ensure their affordability.
- Just over half of respondents agreed that there should be a longer minimum period before Built to Rent properties can be sold. The most popular suggestion given was a minimum of 25 years.
- Many respondents agreed that Vauxhall does not need any more student housing and argued that Lambeth is not a university area and there is a greater need for conventional and affordable housing. However, some respondents acknowledged that did not know enough about Vauxhall or the demand for student housing to comment; 27% said they neither agreed nor disagreed and 15% said they did not know.
- The majority of respondents supported retaining the policy on protecting family homes from conversion. Respondents highlighted the importance of encouraging families to stay in Lambeth and raised a range of concerns about the negative impacts of conversions. However, some respondents acknowledged that the demand for family housing may change as families become smaller.
- Just over half of respondents said they neither agreed nor disagreed or didn't know when asked about meeting the need for Gypsy and Traveller accommodation on the existing site in Streatham Vale. Some respondents commented that they did not know enough about the topic and recommended that consultation is undertaken with Gypsies and Travellers. Some respondents questioned whether Gypsy and Traveller accommodation is appropriate for Lambeth.
- 96% of respondents strongly agreed or agreed with requiring the inclusion of more green infrastructure in new developments because of the positive impact of the environment, the local area, health and wellbeing, air quality, global warming and

flood risk. Respondents suggested that green infrastructure could be provided more imaginatively than more traditional methods whilst some questioned who would be responsible for maintenance.

- Respondents provided a range of infrastructure types that should be planned for in the updated Infrastructure Delivery Plan, with the top two suggestions being parking and community spaces.

### **Affordable Housing**

- Just over half of respondents agreed or strongly agreed with following the Mayor's threshold approach, although many argued that the target should be higher than 35%. Some respondents were concerned about it being a way of developers avoiding their obligations and wanted affordable housing to still be subject to viability testing.
- Developers were supportive of adopting the threshold approach, arguing that it would speed up the delivery of affordable homes. However, many respondents argued that many of the homes being delivered are not genuinely affordable.
- The majority of respondents agreed with increasing the threshold on former industrial sites, with the majority suggesting 50% as the preferred threshold.
- Respondents felt that there was a greater need for affordable housing compared to affordable workspace, although many acknowledged that it was difficult to get the balance right. Other respondents felt that both were equally important and it should be considered on a case by case basis.
- 74% of respondents strongly agreed or agreed that small sites should contribute to the provision of affordable housing. However, some felt that it would negatively impact on smaller developers who should be encouraged. Developers argued the council should follow the government's guidance and the approach could prevent schemes from coming forward.
- Securing more affordable housing for those on the lowest incomes even if it means getting less affordable housing overall was the most popular option. Many respondents felt that those on the lowest incomes are of the greatest need and there is a need to ensure that people do not need to move elsewhere. Others felt that those on middle incomes and key workers need more support.
- 40% of respondents strongly agreed or agreed that in housing estate regeneration schemes should accept less than 50% affordable housing overall to deliver a higher proportion of affordable housing at council rent. 35% strongly disagreed or disagreed and 21% neither agreed nor disagreed. Many respondents supported council or

social housing, although many respondents who disagreed strongly objected to estate regeneration in general.

- Community Land Trusts, London Living Rent and Discount Market Rent/Affordable Rent were the most popular forms of intermediate housing. Many respondents considered Community Land Trusts to be genuinely affordable and a sustainable, long term solution.
- To support workers who provide essential services, many respondents suggested building more council or social housing. Others suggesting working with large employers of key workers to deliver their own affordable housing schemes.
- 70% of respondents strongly agreed or agreed that developers should provide social rented units in Build to Rent developments, particularly to provide mixed communities. Those who disagreed felt it would impact on the deliverability of schemes.
- The majority of respondents supported amending the Local Plan requirements for different sizes of affordable housing to reflect the evidence. Some respondents felt that the requirements should be flexible and reflect changing circumstances whilst others questioned the reliance on long-term projections.
- Almost half of respondents agreed or strongly agreed that developments of specialist student housing should provide affordable housing and suggested that student housing is very profitable. However, some questioned whether affordable housing would work alongside student housing.

### **Housing for Older People**

- Respondents generally supported the provision of specialist retirement housing to encourage people to downsize but acknowledged that it may be difficult to achieve in practice as people are reluctant to leave their family homes and there are not enough suitable, smaller properties available.
- Half of respondents said that housing older people should be exempt from contributions to affordable housing but those who disagreed or strongly disagreed said that all developers will argue they can't afford to provide affordable housing which is important for mixed communities. The GLA pointed out the new draft London Plan considers some types of housing for older people should be making contributions to affordable housing.
- 73% of respondents supported semi-communal living as a way of reducing loneliness and isolation. Respondents suggested that the council should also look at a co-

housing model and that semi-communal living should be designed sensitively as it would suit some people more than others.

- Some respondents suggested that people could continue to live independently if they are able to divide their existing homes into flats which they could then rent out to younger people for company or care.

### **Self-build and custom house building**

- The majority of respondents agreed that plots for self-build and custom build house building should only be available to those with a local connection to Lambeth. Respondents argued it strengthens the community and provides an opportunity for people who genuinely want to stay in the borough rather than developers. Other respondents felt that the approach would discriminate against people outside of Lambeth and could potentially only require a connection to London.
- Small plots or awkward shaped plots of land, brownfield sites, land within estates, back gardens and garages, industrial sites and derelict land were each identified by at least three respondents as being most suitable for self-build and custom build housing in Lambeth.
- 59% percent of respondents felt that development of sites for self-build and custom build housing should only be allowed where this would make efficient use of the land. Respondents argued that land is a finite resource and there is no reason why self-build cannot be multi-storey. Respondents who disagreed argued that high density development may not be suitable for some plots, such some awkward and small size plots of land and variety should be encouraged.

### **Business and jobs**

- Respondents generally agreed that Lambeth should secure supportive and affordable workspace from developers at less than market rents to encourage new businesses to grow and develop. Respondents felt that it would support start-up businesses and creative and cultural industries. Those who disagreed with securing affordable workspace argued that it would impact on the viability of developments and it should not be secured in perpetuity.
- Just over half of respondents felt that the council should target specific sites for the provision of affordable workspace, with the most popular suggestion being town centre sites. This was considered to be a sustainable option and would support the co-location of uses.

- A mixed response was received to requiring developers of new businesses space to work with specialist affordable workspace providers chosen by the council. Some respondents felt that it would provide better outcomes and suggested that businesses would be able to access expertise, investment opportunities and assistance. Others felt that it would limit innovation and competition. Developers suggested they may wish to work with their own preferred providers.
- 44% of respondents felt that affordable housing should be a greater priority than affordable workspace. Many respondents felt that housing should be the priority and others suggested that it should be considered on a case by case basis, reflecting the viability of a scheme.
- Developers argued that any financial contribution sought instead of replacement employment floorspace would need to be viability tested. Other respondents felt that it may be difficult to enforce and that developers should be required to provide what is being lost on-site.
- A wide range of views were voiced regarding the proposed Key Industrial Business Areas (KIBA) changes. Some respondents supported the changes whereas others felt the no net KIBA land should be lost. Others thought there was potential to intensify employment uses in KIBAs by allowing mixed use redevelopment. There were varied views about the proposals about individual KIBA proposals

### **Town centres**

- Respondents generally supported proposals to limit the numbers of betting shops and pay-day loan shops and argued that these uses have a negative impact on the surrounding areas and the people who use them.
- A mixed response was received in relation to limiting A2 uses. Many respondents felt that there were too many estate agents in the borough but supported other A2 uses, such as banks and building societies, as being useful services.
- Respondents supported proposals to implement an Article 4 Direction to remove the permitted development right for change of use from A1 to A2. The most popular suggested was Streatham followed by Clapham.
- The majority of respondents supported adding to existing Local Plan policy to protect pubs. Respondents argued that they are a valuable resource for communities and add to the diversity of town centres and were under threat from residential development taking place nearby or above pubs. Some respondents highlighted the difficulty in testing the viability of a pub.

- Generally respondents felt that nightclubs make a positive contribution to the night time economy, although many respondents were concerned with issues such as noise, litter and anti-social behaviour. Many respondents who supported nightclubs did so on the basis of needing tighter controls on these uses and limiting them to certain locations, for example near to transport hubs and away from residential areas.
- A wide range of suggestions were provided as to how the Local Plan could support the delivery of a cultural programme. These included ensuring diversity, supporting existing and new venues and facilities, financial support and better communications.
- Respondents generally supported the proposed town centre boundary changes, although some respondents suggested further changes to West Norwood and Loughborough Junction. Respondents also argued the need to consider the impact of moving the local centre in Clapham Park on some groups of residents.
- Respondents highlighted a number of issues related to the boundary of Streatham town centre and its uses. These included the lack of identity, the retail offer and the dominance of Streatham High Road.

### **Hotels and visitor accommodation**

- Over half of respondents agreed that short-term lets were a good way to meet demand for visitor accommodation in Lambeth alongside hotels. Respondents felt that this type of accommodation offers flexibility and are a good alternative to hotels. However, many respondents felt that short-term lets reduce the amount of accommodation available for rent and felt that they create a transient community.
- The majority of respondents supported prioritising other uses over hotels, citing the need for more housing in the borough. Respondents argued that there were already too many hotels in Lambeth, particularly in Waterloo. Respondents who disagreed argued that this approach would be a barrier to economic growth.
- 88% of respondents strongly agreed or agreed that planning applications should be required to assess their impact on residential amenity. Impacts included noise, traffic, pollution, parking, deliveries and the transient population. Particular issues were raised for Waterloo and Clapham and the impact on local residents.
- Just under half of respondents strongly agreed or agreed that new hotels should not be supported in Waterloo. Respondents argued there are number of issues in Waterloo, including the creation of a dormitory for tourists, the impact on Lower Marsh and loss of services for residents and the lack of benefit to the local economy.

- Developers argued that the need for hotels should be considered on a case by case basis and a blanket ban on new hotels in Waterloo would not be supported.
- Respondents highlighted a number of issues in relation to 'serviced apartments'. Some respondents argued there is a risk that serviced apartments may be used as permanent accommodation. Others felt there is a greater need for affordable housing over forms of visitor accommodation and serviced apartments may have a negative impact on the community, including the creation of a transient population.

### **Improving air quality**

- Respondents raised significant concerns on the health implications of poor air quality, with suggestions that transport is a big contributor of poor air quality, followed by development and its construction.
- Respondents supported the requirement for air quality assessments as part of the planning application process.
- The most popular types of development were:
  - Developments with potential to significantly change road traffic on busy roads.
  - Developments where people will be exposed to poor air quality for significant periods of the day, particularly for developments located on busy roads, diesel railway lines or in generally congested areas.
  - Developments that introduce or increase car parking facilities by 100 spaces or more.
  - Developments for facilities used by people most sensitive to air pollution, for example schools or healthcare facilities.
- In terms of mitigation measures, respondents highlighted the importance of tree planting and urban greening to alleviate air pollution. Other measures suggested included improving conditions for walking, cycling and public transport journeys; discouraging car use and engine idling; promoting the use of electric vehicles; and providing charging points.
- Some respondents expressed strong concerns about the budget for air quality and would like to see spending on improving air quality increased, the implementation of the Clean Bus Corridor from Streatham High Road to Brixton Hill and a focus on bringing Lambeth's air pollution levels within legal EU limits by 2020.

### **Transport**

- The majority of respondents strongly agreed or agreed that the overall objective should be to encourage more people to walk, cycle and use public transport rather

than travel by car, arguing that car use has significant impacts on human health, quality of life, wellbeing and the environment. However, some respondents argued that car trips are necessary for some people and that public transport is not efficient or frequent enough in some parts of the borough.

- Respondents provided a range of suggestions as to how the council can encourage more people to walk and cycle. The most popular suggestions were better designed streets for pedestrians and cyclists, improved safety and reducing traffic.
- In order to reduce road danger in the borough, the majority of respondents felt that existing rules need to be enforced. This included enforcing speed limits, increasing the number of speed cameras, enforcement against illegal cycling and better enforcement of traffic rules more generally.
- 86% of respondents strongly agreed or agreed with the identified priorities for public transport in Lambeth, stating that the priorities could reduce air pollution, encourage cycling and walking, discourage car use and support a safer and more sustainable community.
- A range of other priorities were also identified. This included suggestions of improvements to bus and rail services and focusing on walking and cycling. Some respondents argued that public transport needs to be improved in Streatham, arguing for an extension of the tube and Crossrail 2.
- 77% of respondents strongly agreed or agreed that more priority should be given to buses and felt that dedicated bus lanes can lead to better bus traffic flow, less congestion and air pollution and will lead to a more attractive bus service. Many respondents argued that cycling and walking should be considered at the same time and that the prioritisation of buses should not have any impact on the safety or space allocation for these modes.
- Respondents who disagreed that buses should be given more priority argued that buses add to congestion levels and that there are already enough bus lanes in the borough. It was argued that buses should be better regulated, making more efficient use of bus lanes and minimising empty buses.
- The majority of respondents strongly agreed or agreed that measures should be considered to reduce overall traffic levels. Suggestions included converting local streets into one-way streets, enforcement of speed limits and installing bollards and speed bumps. Controlled Parking Zones were also suggested. However, respondents who disagreed felt that restricting traffic in local streets would move traffic to main roads, leading to additional congestion and air pollution.

- 88% of respondents strongly agreed or agreed that parking controls should be used to manage demand for parking and argued that parking spaces should be reduced to offer road space to other uses that would benefit the public. Suggestions included protected cycle routes and wider pavements for pedestrians. Controlled Parking Zones were suggested for a number of locations in the borough.
- Respondents who disagreed with parking controls argued that the needs of tradesmen, businesses and local shops should be considered and some activities require car parking, such as visiting health centres. Other respondents argued that the impact on low income families should also be considered.
- Just over half of respondents agreed or strongly agreed that new developments should be car free except for disabled parking. Respondents argued that car free developments discourage car ownership and a shift to alternative modes can reduce air pollution. It was also felt that car free developments would need to be accompanied by viable alternatives, such as adequate cycle parking and car clubs.
- Of the respondents who did not support car free developments, many argued that people need cars, particularly families and older people. Others suggested that this should not be implemented until public transport improvements have been made. It was also argued that car free developments will have an impact on surrounding areas, increasing the stress of parking demand and reducing availability for existing residents.
- The majority of respondents agreed or strongly agreed that alternative uses of the kerbside should be prioritised. The most popular suggestions were cycle parking and car club bays. However, some respondents were not in favour of electric vehicles and argued that they still add to congestion levels and increase parking demand.

## **Waste**

- The majority of respondents supported collaborating on waste issues with the other waste planning authorities, as long as the level of services for householders does not decline.
- Many respondents were concerned that if waste capacity was re-provided outside the borough it would lead to a greater carbon footprint and congestion. There was also a recognition that communities should take responsibility for their own waste.
- Many respondents didn't feel there was enough information on whether identifying KIBAs as suitable for waste use is the right approach.

## **Places and Neighbourhoods**

- The Waterloo Business Improvement District and the South Bank and Waterloo Neighbours Neighbourhood Forum stated they would like to see the policies in the South Bank and Waterloo neighbourhood plan reflected in the Local Plan.
- A large number of respondents raised concerns about a number of issues in Brixton, particularly focussed on the perceived impact of the night-time economy. Suggestions included reinstating the noise abatement out of hours service, amending the town centre boundaries and creating a saturation zone to limit the number of bars.
- Norwood Planning Assembly would like to see more alignment between the work of the neighbourhood plan and the Local Plan.
- The Kennington, Vauxhall and Oval Neighbourhood Forum raised a number of comments including the need for transparency of viability information, the need to review the local views policy and the current interpretation of the tall buildings policy.
- Herne Hill Forum expressed concern about the number of betting shops in the area and the lack of some types of A2 uses, particularly banks and building societies.
- Loughborough Junction Action Group would like to see the town centre extended to LJ works but don't wish to see a 'disturbing' night-time economy develop in the town centre. They would also like to see the council work with Southwark to extend the 'low line' to Loughborough Junction.
- Crystal Palace and Upper Norwood Forum raised concerns over the lack of co-ordination between boroughs of the issues facing the area, particularly transport and parking.
- Respondents argued that Streatham's current retail offer needs to be improved, the centre lacks an identity and the High Road is not conducive to a successful town centre.

## **General comments**

- Historic England argued that the Local Plan Review should take account of changes in the draft new NPPF and the draft new London Plan, particularly the changes to the tall buildings policies in the draft new London Plan.
- They suggested that the completion of the management plan for the Westminster World Heritage Site will assist in ensuring a sound policy.
- The Environment Agency provided comments on flood risk, contaminated land, water resources and quality and biodiversity and would like to see the Local Plan Review aligning with the Thames Estuary Plan.

## **Sustainability Appraisal**

- Respondents welcomed the Sustainability Appraisal. However, one respondent questioned whether the impact on existing residents through changes to Key Industrial Business Areas had been considered through the Sustainability Appraisal. Others questioned the SA Framework and whether the reasonable alternatives proposed should consider estate regeneration.
- Historic England would have liked to have seen the Scoping Report published alongside the Sustainability Appraisal.

## **Part B – Summary of proposed key policy changes in the Draft Revised Lambeth Local Plan October 2018**

### Section 5 – Delivering the vision and objectives

- Updating of the presumption in favour of sustainable development to reflect the new NPPF 2018

### Section 5 – Housing

- Cross-reference to the new Lambeth housing target in the Draft London Plan 2017 (1,589 net additional dwellings per annum (dpa), up from 1,559 dpa).
- Updating to reflect the latest Lambeth Housing Strategy and emerging new Tenancy Strategy.
- Change to affordable housing policy to reflect the Mayor's new threshold approach, with clarification on eligibility for the Fast Track Approach and on expectations around transparency and methodology under the Viability Tested Approach.
- Clarification of the approach to calculating the level of affordable housing that can be achieved through payments in lieu to include build costs plus land values within one mile of the application site.
- Removal of requirements for affordable housing small sites contributions due to publication of new NPPF 2018.
- Slight adjustment to the dwelling size mix requirements for affordable housing, to reflect latest evidence of housing need in Lambeth (overall household sizes are going down).
- Change in the approach to managing residential conversions away from streets designated as 'under conversion stress' to introduction of a minimum size threshold of 150m<sup>2</sup> across the borough, plus a requirement to include a family-sized flat in converted dwellings and clear restrictions on parking permits and on-street parking. This is in response to the Draft London Plan 2017's emphasis on new housing supply from small sites, including conversions, whilst maintaining a managed approach.
- Updating of policy on student housing to reflect the Draft London Plan requirement for 35 per cent affordable student accommodation; and to secure leisure facilities within student schemes for wider community use.
- Cross-reference to London Plan policy on older persons' accommodation.
- Specification that three pitches for gypsies and travellers will be needed in Lambeth over the plan period and that this need can be met by managing churn in vacant pitches on the existing site in Streatham Vale.

- Introduction of new policies on estate regeneration, Build-to-Rent and large-scale purpose-built shared living that add Lambeth-specific requirements to new London Plan policies.

### Section 6 – Economic development

- Grouping of all policy on existing and proposed offices in one place; a clear presumption against loss of office space; marketing period extended from one to two years; inclusion of a cross-reference to the NPPF sequential test for larger offices outside town centres; support in principle for smaller offices in all locations; requirement to consider scope for the inclusion of an element of flexible workspace suitable for micro, small and medium-sized enterprises within very large new office developments (in accordance with London Plan policy).
- A new policy on affordable workspace to sit under London Plan policy on this: affordable workspace is that secured through planning obligations at less than market rents, in defined circumstances.
- Additions to the policy on Key Industrial and Business Areas (KIBAs) to include cross-reference to new London Plan policy on industrial land: this encourages intensification of business and industrial uses in all KIBAs, and allows for intensification alongside co-location with residential and other uses in a limited number of locations identified on the Policies Map.
- A new policy specifically dealing with non-designated industrial sites (sites in B1c, B2, B8 or *sui generis* industrial uses outside of KIBAs): this is intended to align with the approach in the new London Plan and clearly differentiate between policy for these uses and policy for offices outside KIBAs.
- A minor addition to policy on work-live development to provide support in principle within Creative Enterprise Zones.
- Additional policy on hot-food takeaways to make clear drive-through takeaways will not be supported in any location.
- Minor adjustment of the policy on public houses to reflect changes to permitted development rights and align it with London Plan policy.
- Additions to the policy on A2 uses to introduce specific controls on the number and concentration of betting shops and payday loan shops, which are now *sui generis* uses.
- Changes to the policy on hotels to clarify where they will and will not be supported, in accordance with the approach in the new London Plan: this includes no support for additional hotels in Waterloo, where there is a significant existing cluster, but support in

principle for hotels in town centres elsewhere in the borough; limiting the number of hotel rooms that can be delivered in Vauxhall between 2019/20 and 2034/35; and inclusion of a new requirement for hotel proposals to include a visitor management plan and planning obligations to mitigate any negative impacts.

- A full update of the policy on employment and skills to incorporate the new approach adopted in the Lambeth Employment and Skills SPD 2018.

### Section 7 – Social infrastructure

- Amendments to policy S1 to seek replacement provision of equivalent or better functionality, rather than size and quality; to introduce potential for a payment in lieu in exceptional circumstances; and to make clear that the policy tests will apply to proposals for change of use between the D1 and D2 use classes.
- In policy S2: a new requirement for new D2 sports and leisure uses provided alongside hotels, student housing and shared-living schemes to be made available for public access; and an expanded requirement for larger residential schemes to assess impacts on social infrastructure and include provision to meet additional need or make a payment in lieu, and to cover management and maintenance costs.
- Inclusion of cross-reference to relevant London Plan policy in policy S3.

### Section 8 – Transport and communications

- Reference to the Lambeth Transport Strategy, its vision and objectives.
- Integration of the London Plan ‘Healthy Streets’ approach, further emphasising the priority given to walking and cycling.
- Greater emphasis on road danger reduction and on the accessibility of the physical environment for all users.
- Update of public transport priority projects.
- Deletion of Lambeth-specific policy on assessing impacts of development on transport because this is fully covered in the new London Plan.
- Cross reference to London Plan maximum car parking standards, including car-free for PTAL areas 4 and above; and introduction of more stringent, Lambeth-specific maximum car parking standards in PTAL areas 1 and 2.
- All development to be permit-free within existing or planned controlled parking zones.

- Reference to wider digital connectivity infrastructure to enable the future expansion of electronic communications networks, including next generation mobile technology and full broadband connections.

#### Section 9 – Environment and green infrastructure

- New introduction referring to air quality, with a cross-reference to new London Plan policy to be applied to all development proposals; plus reference to Lambeth's Air Quality Action Plan and Air Quality Focus Areas.
- Greater emphasis on green infrastructure in addition to open space; and cross-reference to the new London Plan urban greening factor approach, with an added requirement for on-going maintenance.
- Updating of policy on sustainable design and construction, including reference to Home Quality Mark and Passivhaus design standards.
- Updating of the waste management policy to reflect changes in the new London Plan.

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

- Updated references to security and counter-terrorism considerations and guidance.
- Additions to the policy on public art to support provision of places and spaces suitable for artistic and cultural programming; and to clarify the approach to assessing proposals for memorials and monuments.
- Inclusion of references to the role of the Council's Heritage and Design champion and to the emerging Independent Design Review process.
- Further clarity in the policy on requirements for cycle storage, with additional guidance in supporting text.
- A re-working of the policy on development in gardens to provide greater clarity on how development proposals in rear gardens will be treated.
- Updates to the policy on the Westminster World Heritage Site to align it with the London Plan and latest evidence.
- A new clause to resist development on or in the River Thames.
- Removal of protection from two local views as shown in Proposed Changes to the Policies Map October 2018.
- Re-framing of the tall buildings policy to meet the requirements of the new London Plan by specifying appropriate locations and building heights.

- A new policy dedicated to basement development, as required by the new London Plan; this brings together all policy on basements in one place in the Draft Revised Local Plan.

### Section 11: Places and Neighbourhoods

- Update of policies and introductory text to take account of the current vision and aspirations for each area and include more consistent references to air quality focus areas, open space deficiency areas, strategic areas of regeneration, business improvement districts and emerging neighbourhood plans.
- Promotion of Waterloo and South Bank as a town centre of metropolitan significance (subject to the Mayor of London agreeing this designation).
- Creation of an evening economy management zone in Brixton to support the growth and diversification of the evening and night-time economy whilst managing its impact on local residents.
- An adjustment to the policy on mix of uses in Brixton's covered markets to manage proportions of floorspace rather than units, and to address upper floor uses.
- Designation of a Creative Enterprise Zone in Brixton to promote growth in the existing cluster of creative and digital industries and enable a specific approach to securing affordable workspace.
- Continue to safeguard retail uses in Streatham but require no fewer than 50 per cent of ground floor units in each of the primary shopping areas to be in A1 use (change from 60 per cent).
- Encouraging an area-wide approach to investment and growth in Kennington/Oval to ensure integration with neighbouring opportunity areas and supporting high quality regeneration of the Oval gasworks and adjacent Tesco sites.
- Introduction of a Creative Enterprise Zone in West Norwood to complement the adjacent Commercial Area by supporting mixed-use developments that deliver ground floor workspace for makers and creative and digital enterprises.
- Supporting the implementation of the Loughborough Junction masterplan and identifying opportunities for the comprehensive refurbishment and conversion of the Rathgar Road railway arches.
- Protection for Cooper's Yard Studios in Upper Norwood for cultural, creative and digital uses.