

London Borough of Lambeth Response to Matter 2 – Would the SADPD’s approach to the scale and distribution of housing and economic growth be consistent with the Lambeth Local Plan 2021 (LLP) and the London Plan (LP)?

Issue (i): Does the SADPD set out a positively prepared and justified strategy for the allocations to assist in the delivery of the housing requirements and economic growth?

1. Are the site allocations consistent with the aims of the LLP and would it deliver development in accordance with it? Would the SADPD allocations deliver a sufficient mix of sites to meet assessed needs for the size, type, and tenure of housing for different groups in the community and therefore be consistent with LLP Policy H4?

Yes, the site allocations are consistent with the aims and objectives of the LLP. The LLP has the following strategic objectives (paragraph 3.9):

- A. Accommodating population growth
- B. Achieving economic prosperity and opportunity for all
- C. Tackling and adapting to climate change
- D. Providing essential infrastructure
- E. Promoting community cohesion and safe, liveable neighbourhoods
- F. Creating and maintaining attractive, distinctive places.

The site allocations are consistent with these strategic objectives. The LLP is referenced throughout the SADPD and each of its allocation policies. Please see Annex 1 of the SADPD for the relationship with site allocations in Lambeth Local Plan.

As set out in paragraph 1.14, the new site allocation policies will help to accelerate delivery of housing in the borough and maintain the necessary pipeline of new housing to ensure housing delivery targets can be achieved. Through encouraging investment in the borough, the allocations will help accelerate the provision of housing, including affordable housing, alongside commercial and community space plus key infrastructure for the benefit of local residents.

Each allocation requires development to maximise local employment opportunities and help address skills deficits in the local population by meeting the requirements of LLP policy ED15, including agreement of an Employment and Skills Plan.

As explained in paragraph 1.19 of the SADPD, existing development plan standards and requirements for matters including climate change adaptation will apply to these sites, but the site allocations signal a clear expectation for exemplary approaches in meeting these standards.

Paragraph 1.12 of the SADPD sets out the rationale for the site allocations, one of which is to enable key strategic infrastructure to come forward in a timely way. Site 2 will enable the delivery of enhanced clinical care facilities and contribute to the growing SC1 Life sciences and MedTech health cluster, and Site 24 will optimise clinical and associated ancillary activity and contribute to delivery of the King's Health Partners MedTech cluster.

The site allocations set out the relevant Community Infrastructure Levy charging zones for each site and cross-refer to existing development plan policies in relation to social infrastructure, green infrastructure and digital connectivity infrastructure. Each allocation also states that planning obligations may be sought to mitigate any impacts of development on local public realm and transport infrastructure, such as through the delivery of the Healthy Route Network and Spine Route, improving conditions for cyclists and pedestrians and reducing through-traffic in the vicinity of the sites.

The site allocation policies set out urban greening and tree requirements that help ensure the delivery of high quality, liveable, green and healthy environments. Each allocation includes a community safety section that requires building designs to consider the need for any enhanced protective security measures that could increase community safety and prevent crime. Further crime and safety considerations and requirements are included in this section such as threat and vulnerability of a development; liaising with Metropolitan Police Service; and Secured by Design.

There is a Vision and a set of design, views and townscape principles included for each allocation which set out how safe, liveable, attractive and distinctive places can be maintained or created at each site based on the local context and opportunities, and on a detailed design evidence base for each site (see documents DE 01-24).

The assessed needs for the size, type, and tenure of housing are set out in the Lambeth Strategic Housing Market Assessment (SHMA) 2017¹. Housing policies in the LLP were written to address those needs including

¹ https://www.lambeth.gov.uk/sites/default/files/2021-07/Lambeth_SHMA.pdf

LLP policy H2 on affordable housing, H4 on housing size mix, and H8 on housing to meet specific community needs. Residential development on any of the site allocations in the SADPD would be expected to comply with these policies to provide a suitable mix of different housing.

The SADPD allocates 11 different sites for housing or mixed-use housing developments including eight large sites and three small sites. In total, around 1,020 (gross) homes would be delivered through the site allocations and all 11 seek the delivery of affordable housing, for which there is significant need in the borough.

A policy-compliant size mix and tenure split was used in the development of the indicative approaches to sites included in the design evidence documents, which were then tested for viability in the council's SADPD Viability Assessment (EB 05).

2. Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear, including those deemed to require a site-specific policy?

The Site Selection Evidence Paper (EB 01) outlines the rationale and objectives for the site allocations in the SADPD in paragraph 1.5. Section 3 of EB 01 details the site identification process.

This process included a review of existing site allocations, sites identified on the council's housing trajectory, call for sites work, cooperation with landowners during the preparation of the LLP 2021, local knowledge of larger sites, discussions with landowners through the development management process, and consideration of sites suggested during the consultation process.

Site allocations were selected where they were considered to be available, achievable, and suitable (in line with the PPG on housing and economic land availability assessment, paragraph 001), and on their contribution to the SADPD objectives (paragraph 1.5, EB 01). Given that the majority of development occurs outside of site allocations, the SADPD targets key sites that will accelerate sustainable growth.

The council's ability to meet its London Plan housing target was demonstrated through the examination of the LLP, the SADPD will help to accelerate delivery of development in the borough, comprising housing (including affordable housing), employment floorspace and social infrastructure. Therefore, a highly targeted and focused approach to site allocations represents an appropriate response.

A table has been included in Appendix 1 to this document which provides brief details on sites that were considered but not selected as part of this process. In all cases, these sites were discarded for reasons relating to their availability, achievability, or because of clear reasons for their unsuitability, and were therefore not considered to be reasonable alternatives for the purposes of the Sustainability Appraisal (SA, document SD 06a).

For the selected sites, reasonable alternatives were considered and assessed as part of the SA report in an iterative process throughout the preparation of the SADPD (see stage B2, pages 41-92)-. This exercise assessed different land use mixes and quanta across the chosen shortlist of sites, in order to identify the most sustainable option when considered against the SA framework.

3. Is the SADPD's approach to the allocations being predicated on 'no heritage harm' result in a positively prepared plan that has taken account of all reasonable alternatives and is therefore justified?

Yes. The approach taken is considered justified given that the primary legislation (the Planning (Listed Buildings and Conservation Areas) Act 1990 section 66) and the NPPF require 'special regard' be paid to the conservation of the historic built environment and that there is a strong presumption against heritage harm.

The SADPD has been positively prepared in accordance with paragraph 203 of the NPPF which states:

"203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

[...]

d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

f) the desirability of new development making a positive contribution to local character and distinctiveness; and

g) opportunities to draw on the contribution made by the historic environment to the character of a place."

This consideration of the historic environment is set out within the detailed design evidence for each site (documents DE 01-24). The indicative approach in the design evidence has sought, for each allocation, to optimise the capacity of sites while causing no heritage harm. This is considered a positive strategy within the context of the presumption against harm to heritage assets in the legislation and NPPF. The heritage elements of the SADPD have been developed with significant input from Historic England. This includes restrictions on heights, considered necessary and justified given the level of heritage significance.

Other potential development proposals that might take a different design approach can be considered on their merits at the point that a planning application is submitted. If applications include harmful heritage impacts, under the current national policy position, public benefits can be used to outweigh less than substantial harm. This approach is reflected in the site allocation policies – for example, Site Allocation 2, which states "where

heritage harm results, proposals will be required to meet the requirements of the National Planning Policy Framework”.

4. What is the justification as to why a trajectory illustrating the expected rate of housing delivery has not been included, would the SADPD therefore be consistent with paragraph 75 of the Framework?

Local planning authorities should monitor their deliverable land supply against their housing requirement, as set out in adopted strategic policies. The council monitors its deliverable land supply against the housing requirement, as required by the Framework paragraph 75. This work is undertaken on an annual basis

Annex 12 of the LLP sets out Lambeth's housing trajectory for Years 1 to 10 of the plan period. The trajectory set outs the anticipated rate of development for specific (large) sites. This trajectory is fully updated on an annual basis and published within the relevant annual Housing Development Pipeline Report. The most recently published trajectory is in the 2022/23 Housing Development Pipeline Report², and an updated trajectory is currently being produced. The process of updating the trajectory consists of (i) reviewing existing sites in the trajectory and updating them where necessary (for example where there are changes to the planning status of the site, or the number of homes coming forward changes), and (ii) adding new sites once they meet the national definitions of 'deliverable' or 'developable' as set out in the Framework.

An update to the trajectory is expected to be prepared before the end of the hearing sessions, and the council would accept a recommendation from the inspector to include an updated trajectory in relation to the SADPD sites as an appendix to the SADPD.

It is also recognised that the individual site allocations do not indicate expected delivery timelines, and it is therefore not clear when the sites in the SADPD will contribute towards the council's housing trajectory. To rectify this, a number of modifications are proposed to insert approximate delivery timeframes for sites where this information is available – see Appendix 2 of this document for further detail. For sites where delivery timeframes are not currently available, the council will continue to work with developers and landowners during the examination period to try to determine these timeframes and present them as additional proposed modifications.

² <https://www.lambeth.gov.uk/sites/default/files/2024-04/Housing%20development%20pipeline%20report%202022-23.pdf>, pages 32-48

5. Has the viability of the SADPD been tested and evidenced in accordance with the advice contained in the PPG and does the viability evidence take into account relevant policy requirements arising from the SADPD and the LLP?

A viability assessment of the SADPD was undertaken by BNP Paribas in June 2023 (examination document EB 05). BNP Paribas have significant experience of undertaking assessments of this kind as part of Local Plan processes, and the assessment was undertaken in line with the requirements of the PPG on Viability and drawing on their knowledge of suitable inputs to the assessment. All sites were individually assessed, with the exception of the two hospital sites (sites 2 and 24), due to the lack of any residential component to these sites. Paragraphs 2.17-2.21 of the assessment lay out the national policy context in which the assessment was undertaken, and paragraph 2.27 explains the local policy context and explains which LP and LLP policies are relevant to the viability assessment. The assumptions of the appraisal are set out in section 4 and summarised against the PPG requirements and the relevant policy requirements in the table in Appendix 3 of this document.

London Plan low carbon requirements under LP policy SI 2(C) are identified in paragraph 2.27 of the viability assessment as potentially relevant; and the PPG paragraph 012 specifically mentions biodiversity net gain as a policy requirement that should be considered. Neither of these requirements are explicitly considered in the assessment, however BNP have stated that LP policy SI 2 costs are typically around 0.25% of construction costs, and a DEFRA impact study has indicated that biodiversity net gain costs on sites in London are typically 0.1% of construction costs³. Due to the small size of these additional costs, there is considered to be no material impact on viability.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/839610/net-gain-ia.pdf, table 20, page 49

6. Is the SADPD consistent with the LLP in terms of the approach to economic development, retail and town centre uses? Is the evidence base up to date?

The LLP reflects national and LP policy regarding the location of economic development, retail and town centre uses. This is further reflected in the uses proposed for the SADPD sites.

Those sites that fall within town centres (SA18 and SA20 plus parts of SA3 and SA23) are allocated for uses at ground floor level that are appropriate to those centres. A site that sits outside of any centre but currently contains retail uses (SA21) is proposed to change to uses that are more appropriate to its location – note that there is no requirement to reprovide the existing retail uses as they are edge of centre (within 300m of the primary shopping area).

For sites that currently contain industrial floorspace (SA7, SA17, SA18 and SA22), the site allocation specifies reprovision of a particular amount of light industrial floorspace to ensure there is no net loss of floorspace, in line with the objectives of LLP Policy ED4 for mixed-use development of non-designated industrial sites. SA1 contains an element of railway arches and the proposed uses for the site are consistent with LLP Policy ED6(A) in this location within the Waterloo Opportunity Area.

The evidence base used is that prepared for the LLP Examination⁴. This is considered to be up to date. For retail and economic development, including offices, the approach used is consistent with the adopted LP and LLP policies relating to development of industrial sites and the location of retail development.

Regarding affordable workspace, the proposed amount of office use for SA1 would trigger LLP policy ED2. The policy for SA1 sets out specific requirements for this site in line with policy ED2. Affordable workspace would also be required at SA8 and SA9 if office floorspace comes forward as part of an application that meets the thresholds set out in policy ED2. These site allocation policies make clear that, in those scenarios, policy ED2 applies.

It is also relevant to note that the LLP sets out only a very modest requirement for new retail floorspace across the borough in the period to 2041 (LLP policy ED7(B) – 800 sqm net additional comparison goods and no figure for convenience goods) such that any subsequent change to the requirement is likely to be minimal. Even were this not to be the case, the entire evidence base for the LLP will be refreshed and updated when a

⁴ <https://www.lambeth.gov.uk/planning-building-control/planning-policy-guidance/lambeth-local-plan-2021/evidence-base>

review of the Local Plan is undertaken - this is intended to commence later in 2025, and any issues that might be identified could be more effectively dealt with at that point on a borough-wide basis. For these reasons the current evidence base is considered to be sufficiently up to date, and it would not be proportionate to commission a further update solely for the SADPD.

Each of the proposed site allocations includes specific reference to LLP policy ED15 to ensure that each development maximises local employment opportunities and helps address skills deficits in the local population.

Appendix 1 – Details of Discarded Sites

Site	Reason for not progressing
Doon Street Car Park	Extant permission with owner actively seeking to fully implement. Site allocation not necessary.
Johanna Primary School, Baylis Road	At the time of site selection, proposals for a mixed-use redevelopment of the site were well-advanced. While these have not come to be implemented, at the time of site selection, a site allocation appeared unnecessary for this site to progress.
79-87 Westminster Bridge Road	At the time of site selection, discussions were underway with a developer for a hotel development on this site, which has since been granted permission. Site allocation not necessary.
BFI IMAX, Waterloo Roundabout	Site is significantly constrained, with multiple ownership and complex below-site infrastructure. It is considered that a bespoke development management process would be a better approach to dealing with the complexity of the site rather than a site allocation. Site allocation not considered the most effective approach.
Woodlands Nursing Home, Dugard Way	At the time of site selection, a planning application was well-advanced, and has since been granted. Site allocation not necessary.
Artist Studios on Railway Viaduct at Newnham Terrace	The location of the site on a railway viaduct makes delivery particularly challenging, and the site was not considered an achievable site within the SADPD. It is considered that a bespoke development management process would be a better approach to dealing with the complexity of the site rather than a site allocation. An emerging masterplan, being undertaken in partnership with Network Rail, has now identified this site for further exploration. Site allocation not considered the most effective approach.

Site	Reason for not progressing
Travis Perkins, 77 South Lambeth Road	The landowner/occupier indicated that they have no interest in redevelopment at this time. Site not available.
TfL site on Christchurch Road/Streatham Hill	Metropolitan Open Land with a number of protected trees and a Grade I listed building opposite. Site not suitable.
Streatham High Road/Station Approach Streatham	Due to strongly trading supermarkets on the site, existing land values are too high for redevelopment to be viable. Site not achievable.
Norwood Road/Christchurch Road, Tulse Hill Methodist Church, and artist studios on Parade Mews	The collection of artist studios is functioning successfully, and the site is in multiple ownership. On this basis, it was felt that the site did not warrant a comprehensive approach to redevelopment and could be left to develop on a piecemeal basis without a site allocation. Site allocation not necessary.
Brixton prison, Jebb Avenue	Decommissioning plans had not progressed at the time of site selection, and have still not progressed today. Site not available.

Appendix 2 – Expected Delivery Timescales

Site	Notes on Expected Delivery Timescale	Proposed Modification
SA1	Discussions with council's Development Management team – site expected to start in years 1-5 but complete in years 6-10.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "2030-2035"
SA2	No current information – no details provided in representation R0120.	N/A
SA8	No current information – no details provided in representation R275.	N/A
SA9	Site not expected to be available for redevelopment for at least 10 years – see representation R0275.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "After 2035"
SA17	Discussions with some landowners during SADPD process indicate potential for delivery in years 6-10, though no detailed timeline in representation R0056 and no other representations received from landowners.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "2030-2035"
SA20	Representation R0281 – current lease of Tesco store expires in 2028, though store will be reprovided as part of development. Discussions with council's Development Management team – site expected to deliver in years 6-10.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "2030-2035"
SA21	Representation R0287 – pre-app discussions held in 2020 and 2021. Discussions with council's Development	At end of site allocation, add new line.

Site	Notes on Expected Delivery Timescale	Proposed Modification
SA21 (cont.)	Management team – site expected to deliver in years 6-10.	Left hand column: "Expected delivery timescale" Right hand column: "2030-2035"
SA3	Discussions with council's Regeneration team – confirmed intent is to submit planning application in 2025 and deliver in years 1-5.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "2025-2030"
SA18	Discussions with council's regeneration team – lease on B&Q site expires in 2034. Some discussions held with surrounding landowners, but no detailed timelines provided in representations. Site is in multiple ownership and is likely to come forward in stages, so some sites may deliver before the B&Q site becomes available.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "After 2035"
SA7	Application 24/03262/FUL currently being determined for southern part of the site at 6-12 Kennington Lane – delivery expected in years 1-5. Representation R0120 – no detailed timeframe provided for northern part of the site, representor keen to continue discussions.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "2025-2030 for southern part of the site"
SA22	Conditional planning permission subject to the completion of a Section 106 agreement granted in November 2024. Site therefore expected to deliver in years 1-5.	At end of site allocation, add new line. Left hand column: "Expected delivery timescale" Right hand column: "2025-2030"
SA23	No current information – no details provided in representations.	N/A
SA24	Site is expected to be redeveloped piecemeal over a number of years. Permissions 21/04994/FUL and 22/00618/FUL granted in November and December	At end of site allocation, add new line.

Site	Notes on Expected Delivery Timescale	Proposed Modification
SA24 (cont.)	2024, so some development expected to begin in years 1-5.	Left hand column: "Expected delivery timescale" Right hand column: "2025-2035"

Appendix 3 – Comparison of Viability Assessment Assumptions with Requirements of PPG Viability and Relevant LLP Policies

Appraisal assumption (with relevant paragraphs)	Relevant PPG section or policy requirement
Residential quantum and other land uses delivered on the SADPD allocations (4.2).	Based on the details of the allocations in the SADPD, and the design evidence base that provides indicative site layouts and capacities. The space assumptions made in the design evidence base incorporates the requirements of LLP policy H5 on external amenity and child playspace and LLP policy T3 and LP policy T5 on cycle parking requirements.
Affordable housing tenure and values - 35% affordable housing, of which 70% social/London affordable rent and 30% intermediate rent. Affordable housing threshold raised to 50% on sites in public ownership and sites where industrial floorspace would be lost. (4.4-4.5).	Based on the tenure mix and social rent levels sought by LLP policy H2.
Affordable workspace - 10% of floorspace at 50% of market rent (4.9).	Based on LLP policy ED2.

Appraisal assumption (with relevant paragraphs)	Relevant PPG section or policy requirement
Accessibility standards - applied to 10% of dwellings (4.12-4.13).	Based on LLP policy H5 (which itself refers to London Plan policy D7)
Notional contribution per residential unit to s106 and s278 - £2,500 per unit (4.21)	This includes the requirement of LLP policy ED15 for financial contributions towards training and apprenticeships.
Mayoral CIL - band 2 (4.18).	Based on GLA MCIL2 charging schedule
Lambeth CIL - variable in different parts of the borough (4.19-4.20).	Based on Lambeth CIL charging schedule
Residential sales values - based on comparable sites (4.3); Rents and yields for commercial development - based on comparable sites (4.9).	PPG para 011 - "For viability assessment of a specific site or development, market evidence (rather than average figures) from the actual site or from existing developments can be used."
Build costs - based on BCIS data (4.10-4.11).	PPG para 012 - "build costs based on appropriate data, for example that of the Building Cost Information Service [...]"

Appraisal assumption (with relevant paragraphs)	Relevant PPG section or policy requirement
Build costs – based on BCIS data (4.10.-4.11) (Cont.)	site-specific infrastructure costs, which might include access roads, sustainable drainage systems, green infrastructure, connection to utilities and decentralised energy.”
Exceptional costs - "In the absence of detailed site investigations, it is not possible to provide a reliable estimate of what exceptional costs might be. Our analysis therefore excludes exceptional costs, as to apply a blanket allowance would generate misleading results. A degree of the costs for addressing abnormal ground conditions is already reflected in BCIS data, as such costs are frequently encountered on sites that form the basis of the BCIS data sample" (4.28).	<p>PPG para 012 - "abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value"</p> <p>The SADPD allocations identify potential sources of contamination, but in the absence of detailed site investigations it is not considered possible to provide an accurate estimate of potential levels of contamination and remediation costs on individual sites.</p>
Development finance - 7% rate, "reflective of current funding conditions" (4.15).	PPG para 012 - "general finance costs including those incurred through loans"

Appraisal assumption (with relevant paragraphs)	Relevant PPG section or policy requirement
<p>Professional fees - 10% (4.14);</p> <p>Commercial letting fees - 15% of first year's rent (4.16);</p> <p>Marketing costs - 3.25% (4.17);</p> <p>Development and sales period - assumed sale rate of 6 units per month (4.22).</p>	<p>PPG para 012 - "professional, project management, sales, marketing and legal costs incorporating organisational overheads associated with the site."</p>
<p>Benchmark land value - existing use value, based on rateable values of sites capitalised by investment yield + 20% premium (4.30).</p>	<p>PPG para 013 - "To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner."</p> <p>PPG para 015 - "EUV can be established in collaboration between plan makers, developers and landowners by assessing the value of the specific site or type of site using published sources of information such as agricultural or industrial land values, or if appropriate capitalised rental levels at an appropriate yield"</p>

Appraisal assumption (with relevant paragraphs)	Relevant PPG section or policy requirement
Developer's profit - 17% of private residential GDV (4.26).	PPG para 018 - "For the purpose of plan making an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies."