

Morgan, Jackson

From: Thomas Davies [REDACTED]
Sent: 03 June 2024 10:17
To: Planning Policy Consultations
Cc: Laura Bourke
Subject: LB Lambeth statement of representation to City Plan 2040
Attachments: Representation-Form-for-City-Plan-2040 - LB Lambeth response to Policy S8 and Policy DE1.pdf; Representation-Form-for-City-Plan-2040 - LB Lambeth response to Policy S13.pdf

Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear sir / madam

Please find attached LB Lambeth’s statements of representation in response to the City of London Corporation’s Reg 19 consultation on its City Plan 2040. The first of these is in response to Policy S8 and DE1 (Design and Sustainable Design). The second is in response to Policy S13 (Strategic Views).

I trust this is all in order, please contact myself or Laura if you have any questions.

Thanks

Tom

Disclaimers apply - full details at www.lambeth.gov.uk/email-disclaimer



Model Representation Form for Local Plans



Ref: Reg 19

Local Plan Publication Stage Representation Form

(For official
use only)

Name of the Local Plan to which this
representation relates:

City Plan 2040

Please return to City of London Corporation BY 11:00PM 31 May 2024

emailing to: planningpolicyconsultations@cityoflondon.gov.uk

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy. Please also see our Statement of Representations Procedure available at: City Plan 2040 - City of London.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal
Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if
applicable)

Title

Mr

First Name

Thomas

Last Name

Davies

Job Title

(where relevant)

Senior Policy Planner

Organisation (where relevant)	LB Lambeth (LBL)	
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	Yes	No	<input type="text"/>
4.(2) Sound	Yes	Yes	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	YES	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

LBL is supportive of the approach to sustainable design in the City Plan 2040, as set out under Strategic Policy S8: Design and Policy DE1: Sustainable Design.

In particular, the approach to *Retrofit First* (Policy DE1 (1) and S8 (1)) across these policies is commended. Together, the policies provide a pragmatic approach to ensuring that the retention and retrofit of existing buildings is the starting point for new development, while allowing redevelopment where this would represent the most sustainable or suitable option for a site.

LBL consider this represents a sound and justified approach to meeting the City Plan's sustainability objectives, namely supporting climate mitigation and resilience, environmental protections, and waste management, and will play an important role in the City of London meeting its Net Zero pledge.

LBL supports the requirement for carbon reporting on all major developments, as set out under Policy DE1 (2). This will ensure a standardised approach is taken when considering the different carbon options for a development proposals, and represents an effective and transparent means for considering the appropriateness of retrofit against redevelopment.

LBL also supports the requirement for whole life-cycle carbon assessments for all major development, as set out under Policy DE1 (3). Whole-life carbon assessments are an effective mechanism for understanding the total carbon emissions of a building over its life time, and have been tried and tested through London Plan Policy SI2 for applications referable to the Mayor for a number of years. The approach is justified given the objectives of the City Plan set out above.

Lambeth considers the aforementioned policies to be sound and consistent with national policy, namely NPPF para 157 and 159. These policies would also support the statutory requirement under Section 19(1A) of the Planning and Compulsory Purchase Act 2004 which requires local planning authorities to include in their Local Plans "policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change".

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Tom

Last Name

Davies

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LBL considers *Strategic Policy S13: Protected Views* to be sound, following the amendments made since the Reg 19 City Plan 2036 was published for consultation.

LBL is supportive of the addition of criterion 4 of Policy S13 which states that the City Corporation will have "*regard to views of the City that have been designated by other Local Planning Authorities*".

This additional text reflects the suggestions made by LBL in its representation made in May 2021 to the Reg 19 consultation to the Corporation's City Plan 2036.

The nature of local views designations in Lambeth and adjoining boroughs means that many views cross borough boundaries. This means that cooperation between boroughs is particularly important if views are to be managed effectively. LBL considers Policy S13 provides an effective and justified approach to protecting and enhancing views of the City's skyline.

As a result of these changes, Lambeth considers the plan to be sound, with no further concerns outstanding.

The CoL has taken a positive approach to plan making, having regard to the LBL representations. CoL has also maintained regular correspondence with their counterparts at Lambeth. Officers have met on various occasions under the duty to cooperate to discuss the preparation of development plan documents and consider any strategic and cross border issues.

Further detail of how the parties have worked together under the Duty to Cooperate are documented within a joint Statement of Common Ground between the two parties which will be published in document library.

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