



LONDON BOROUGH OF LAMBETH

Planning, Transport and Development

Sustainable Growth and Opportunity

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SUMMARY OF PROOF OF EVIDENCE

of Ms Dominique Barnett MPLAN MRTPI

Town and Country Planning (Inquiries Procedure) (England) Rules 2000

Appeal by: Anthology Kennington Stage

Appeal site: Woodlands Nursing Home, 1 Dugard Way, LONDON SE11 4TH

Reference: APP/N5660/W/20/3248960

LB Lambeth Reference: 19/02696/FUL

15 October 2020

Summary of Proof of Evidence

The Proof of Evidence was prepared by Dominique Barnett MPLAN MRTPI. I have worked at two Local Planning Authorities (LPA) prior to Lambeth and have experience in a range of planning policy projects including the preparation of Local Plans, supplementary planning documents and neighbourhood plans. I have experience of providing planning policy advice on a range of major applications.

Had the LPA still been able to determine the application, it would have refused the application for a number of reasons set out in the LPA's Statement of Case. In my proof I discuss in detail Reason for Refusal 3.

The Appeal scheme does not provide a balanced unit size mix across low cost rent, intermediate and market housing tenures. This would not secure the objective of achieving a mixed and balanced community or respond to housing need and the proposed housing mix has not been justified. The Appeal scheme would therefore be contrary to Chapter 2 of the NPPF, policy 3.8 of the London Plan (MALP 2016), Policy H10 of the Intend to Publish London Plan (December 2019), Policy H4 of the Lambeth Local Plan 2015 and Policy H4 of the Draft Revised Lambeth Local Plan (Submission Version January 2020).

The Lambeth Local Plan 2015 states the affordable element of residential developments should reflect the preferred borough-wide housing mix for social/affordable rented and intermediate housing set out in policy H4. For market housing, a balanced mix of unit sizes including family-sized accommodation should be provided.

Under the emerging Local Plan policy, the low-cost rented element of residential developments should reflect the preferred borough-wide housing mix set out in policy H4. For market and intermediate housing, a balanced mix of unit sizes including family-sized accommodation should be provided.

Considering the planning policy position, the Appeal Scheme's mix is unacceptable as it would provide:

- Too many 1-bedroom and too few 3+ bed affordable units under adopted policy.
- An unbalanced mix of unit sizes and no family-sized units for the market housing under adopted policy.
- Too few 1-bedroom low cost rent units under emerging policy.
- An unbalanced mix of unit sizes and no family-sized units for the market and intermediate housing under emerging policy.

Both the adopted and emerging Local Plan are clear that while developments are expected to reflect the preferred dwelling mix, rigid application of these requirements may not be appropriate in all cases. When considering the mix of dwelling sizes appropriate to a development, the council will have regard to individual site circumstances including location, site constraints, viability and the achievement of mixed and balanced communities. The Appellant has sought to justify the proposed dwelling size mix based on ward-level data on household size, tenure and under-occupancy for the Prince's ward as set out in the Lambeth Strategic Housing Market Assessment (SHMA) 2017. This approach is not supported by planning policy and the Appellant has not

justified the proposed dwelling size mix in relation to site location, site constraints, viability or the achievement of mixed and balanced communities.

The SHMA 2017 is part of the evidence base which is used to inform policies in the emerging Local Plan, alongside other policy documents and priorities. It is not policy and does not have the status of the development plan. As planning applications are to be determined in accordance with the development plan it therefore cannot be argued that the Appeal Scheme's dwelling size mix meets all relevant policy tests on the basis that it responds to ward level data in an evidence base document.

The Appellant also seeks to justify its dwelling size mix on the basis that two bed units should be considered family units. Both the London Plan and Local Plan are clear that family housing is generally defined as having three or more bedrooms.

Overall the housing size mix in the Appeal Scheme does not provide for a range of dwelling sizes to meet current and future housing needs and fails to achieve the objective of securing mixed and balanced communities. On this basis, the Proof of Evidence has demonstrated that the Appeal should be dismissed.