

APPENDIX 1 - OUTSTANDING OBJECTIONS AND PROPOSED COUNCIL RESPONSE AT DEPOSIT STAGE

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
2.1.7	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4849	While this Para is not in the body of the UDP, we object on the grounds that it gives insufficient recognition to the high proportion of young people living in Lambeth. This has important implications for housing, provision of schools and colleges and for the protection and enhancement of community facilities for young people. The text should give greater recognition to the need to take young people's interests into account in the UDP's policies.		Not accepted - recognition has already been given in the paragraph.
2.1.11	Mayor of London	1480	3434	The reference to the "Environment" in Lambeth is particularly short in comparison to the other issues referenced to in this section, such as poverty, housing, health etc	This section could be expanded and could for example refer to the Borough's Air Quality Management areas, waste management, biodiversity and architectural heritage Etc to give a more balanced approach.	Not accepted. This is covered adequately in the plan already.
2.1.11	Nicholas Long	2248	5203	The statement is sadly correct. However nowhere in the rest of the document can I find an acknowledgement of the facts or any set of proposals setting out the local authority's intended approach to tackling those parts of its responsibilities that fall within the ambit of the plan.	A comprehensive set of policies for working with partner agencies, including the police, to aid the exceptional fight against crime in the Borough. This is cross-cutting (traffic restraint to urban design etc.)	Not accepted. The UDP can only go so far in seeking to reduce crime, through the design of new buildings. Para 3.5.5 seeks a target of 75% of new housing achieving 'Secured by Design' standards. In addition it is proposed to include a new policy (Policy 31a) to address this issue.
2.2	Westow Hill Improvement Group	1614	2268	Gipsy Hill Ward, which takes in Upper Norwood Lambeth's Portion, is one of the most deprived areas of the UK. Why are we ignored by Lambeth in the future Development Plan?		Not accepted. Gypsy Hill has not been "ignored" in the UDP. The plan policies apply borough-wide and just because there is not a specific policy or MDO relating to an area does not mean that environmental improvements would not be supported.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
2.2.5	Mayor of London	1480	3435	The sixth bullet point states that the London plan will set out the policy framework for the Mayor's involvement in individual major planning decisions in London. The use of "strategic" as opposed to "major" is more accurate.	Delete "Major" and replace with "strategic."	Not accepted. The existing wording is considered appropriate.
3.7	Mayor of London	1480	3432	This section is already out of date and will need updated at second deposit as more of the Mayor's strategies will have progressed from drafts to final adopted strategies over the coming months.	Amend the text when other strategies are finalised.	Accepted. This will be done at final adoption stage.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.7	County Hall Owners & Residents Association	2024	4635	<p>This Association is in agreement with every single one of the 18 operational objectives, and in particular endorses the overall aim of the Plan: 'To promote the sustainable development of Lambeth by making it a great place to live visit and work, based on strong communities, better living conditions, equality and citizenship.'</p> <p>However, 3.6.6 (page 16) which summarises the strategy (with which we agree) in the same sentence makes an exception of the Central Area, where the homes represented by this Association are Sited. (NB the Cross reference to more detail in 'the next section' is not clear where is it).</p> <p>Furthermore, 3.7 Putting the Plan into Action - Achieving the Objectives, gives cause for concern since it seems to be based on the premise that the only way to achieve change is by accepting all development, and mitigating its downside through conditions and planning obligations. Indeed 3.7.8 states that it is these, which will 'secure the implementation of the plan's policies'. If unspecified and survive, highly negotiable conditions and planning obligations are the basis on which policies have been drafted to achieve the objectives then there is no certainty for anyone (3.7.1). '</p> <p>Sorry, but for all the reasons mentioned previously, and those below in relation to specific policies, we are not confident that the Draft Plan meets these objectives, for all people living in all parts of the Borough, particularly those in the Central Area.</p> <p>It is very important for us that we are accorded the same residential standards and controls as the rest of the Borough -equality of treatment is a basic human right, and this type of</p>		<p>Support for operational objectives welcomed; however these have been amended and are now presented as strategic policies. 3.6.6 This section has been deleted. 3.7 Not accepted - This section does not mean that change can only be achieved by accepting all development; for example paragraph 3.7.7 outlines the Council's powers to refuse as well as grant planning permission. 3.7.8 Not accepted - The wording is in line with the Act which allows schemes contrary to the plan where 'material considerations indicate otherwise'. The wording in the plan comes from a government 'plain english' version of the statutory provision.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>discrimination is wrong.</p> <p>So much detail has been lost, in the way of Standards and definitions, that there is very little on which to base 'good reasons' (3.7.11 page 17) for determining planning applications. The converse is that there IS little real protection for residential amenity because there are no good reasons' from the Plan on which to base a refusal.</p> <p>The South Bank is a great place to live, but will not be if it is surrounded by high rise buildings, the area becomes any more congested, we lose any open space. We lose our views; we lose our daylight, major retail development results. In Increased traffic and pollution, management of London Eye visitors is not strictly controlled, or there is not comprehensive control of illegal trading, illegal parking, and street crime in the area.</p>		
2.2.7	Mayor of London	1480	3437	The inclusion of this section is welcomed however the source of the text should be included.	Make source of text explicit.	Not Accepted. It is not necessary to source the text.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
2.3.3	Lambeth Environment Forum	2130	5340	<p>In our view the government's treatment of sustainable development in the UK strategy as expressed in the 4 bullet points quoted in Para 2.3.3 does not adequately recognise the global environment and development issues central to the Agenda 21 agreement signed at the 1992 Earth Summit. We recognise that the UDP must quote relevant central government policy. However we would like to see Lambeth committing itself to doing better and to become an exemplary sustainable borough. In our view, Para 2.3.5 stating Lambeth's commitment to achieving sustainable development should redress the imbalance in central government priorities. We suggest additional wording to achieve this in section 5. Our reasons for objecting are as follows:-The sustainable development agenda agreed at the Earth Summit in 1992 recognised the fact that human development has so far achieved social and economic needs and wants, at the expense of the natural environment. This is unsustainable as there is a limit, fast being approached in the opinion of many scientists, to the capacity of ecosystems to withstand destruction and continue to support life. The challenge for the 21st century is to find more environmentally sustainable ways of meeting our needs. We take issue with the government's goal as stated in the bullet point 'maintenance of high and stable levels of economic growth and employment' in Para 2.3.3.</p> <p>This implies a continuation of business as usual which will make achieving the first three bullet points impossible. High economic growth is unsustainable and leads to the problems of a 'boom and bust' economy and high inflation. We fully recognise that sustainable development requires a reduction of poverty and a more equitable distribution of wealth within and between countries. This requires the creation of</p>	<p>Alter the wording of Para 2.3.5 to the following: Lambeth is committed to achieving sustainable development through its environmental charter and this is the key underlying theme of the new Lambeth Plan. It seeks to become an exemplary sustainable borough and to express and develop the themes of the national strategy locally by promoting: Social progress which recognises the needs of everyone within Lambeth and across the world. Effective protection and replenishment of the local and global environment through local action. Sustainable use of natural resources through encouragement of conservation and innovative technologies Creation of jobs in environmentally and socially sustainable activities.</p> <p>Para 2.3.6 Lambeth wishes to ensure the pattern and form of development in the borough contributes to London wide, national and international goals for environmental sustainability and for improved health and quality of life, by encouraging energy and resource efficiency, by conserving land, soil and biodiversity and by promoting holistic design in which the built environment is set in a green framework. Lambeth has had full regard to the Government Good Practice Guide GPG22 'Planning for Sustainable development - Towards Best Practice' etc. Add a new sentence</p>	<p>The UK Sustainable Development Strategy is national policy and it would be inappropriate for Lambeth to question it. See also proposed changes to 2.3.5. It would be inappropriate to add indicators for energy consumption and carbon emissions as these are not good indicators of the contribution of planning decisions to sustainability and there is no clear methodology for assessing these matters at a local authority level. Lambeth will review progress on the indicators as often as resources allow.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>more jobs. However, the economic goal should be to create high employment in activities which are designed to be environmentally sustainable through radical innovations in resource efficiency. The UDP provides an important lead to investors who may wish to develop new economic activity in the borough. It is vital to spell out to them that Lambeth wants to encourage such environmentally sustainable economic activity.</p> <p>It is also important to get this message over to developers and the public in their approach to built development in the borough as buildings, and the households and businesses occupying them are major consumers of energy and materials and have a major impact on the natural environment, biodiversity and life support systems, both locally and globally. We feel that detailed design guides should be provided to developers and those drawing up area master plans to give clear practical advice on how environmental principles can be integrated into and given practical expression into schemes.</p> <p>We feel the Sustainability Performance Indicators listed in Para 3.5 are weak on the environmental issues but recognise they have to reflect resources available for effective measurement and monitoring. We feel, however, that indicators and targets should be set to measure the provision of accessible open space and for areas for nature conservation. Indicators of boroughwide energy consumption, carbon emissions and the average energy efficiency of the borough's building stock should also be included and targets set for improvement. The GLA is beginning to monitor these for London boroughs which will remove the burden from Lambeth. We feel the set of indicators should be reviewed at least annually and developed and improved over time to</p>	<p>after 'promote energy conservation and sustainable urban design' Lambeth will provide design guides to demonstrate how these principles may be effectively put into practice in new developments. Para 3.5 Add indicators and targets for energy consumption and carbon emissions, energy efficiency of the built environment, provision of accessible open space and provision of nature conservation areas. Add a further sentence at the end of Para 3.5.5 as follows "The indicators listed in the table will be reviewed at least annually and added to over time to provide a more complete picture of trends in all aspects of sustainable development."</p>	

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
2.3.5	Andrew Simpson MA BA MRTPI	2043	4753	<p>provide a more complete picture of trends.</p> <p>OBJECTION to Omission</p> <p>I welcome the commitment to achieving sustainable development.</p> <p>However, I would argue that it is important to recognise and emphasise (as you do elsewhere in the plan) that:</p> <ul style="list-style-type: none"> -Lambeth's policies can not be seen in isolation -The contribution that they can make to the achievement the Mayor's vision (highlighted in paragraph 2.2.7 of the Plan) of London as a sustainable world city 	<p>I would suggest that the first sentence of paragraph 2.3.5 should be rewritten to carry forward and incorporate the simple phrase from policy G 1 in the Adopted 1998 Plan and to read:</p> <p>Lambeth is committed to contributing to the creation of an environmentally sustainable pattern and form of development in London by achieving sustainable development in the borough, through its Environment Charter and this is the underlying theme of the new Lambeth Plan</p> <p>The advantage of this would be</p> <ul style="list-style-type: none"> -Link with point made in paragraph 2.2.7 of the Plan -Show a commitment to sustainable development and environmental protection and to making most of opportunities to contribute to the creation of a more environmentally sustainable pattern and form of development in London. 	Accepted - change made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
2.4.1	County Hall Owners & Residents Association	2024	4625	<p>Objection to interpretation of National & Regional Planning Policy.</p> <p>PPG1 advocates locating development in urban areas with good public transport accessibility to reduce the need to travel (2.4.2 page 7)</p> <p>PPG13 stresses the importance of planning to reduce the need to travel, in particular locating intensive development in areas highly accessible to public transport.</p> <p>Both these statements are about reducing the need to travel. We don't understand how lots of transport reduces travel; more transport means more travel. And locating intensive development in areas highly accessible to public transport merely creates intensive amounts of travelling as all the extra people working in that area crowd into the same small area. Surely Waterloo's problem is that it's nearly full up already, and it's transport systems are at breaking point.</p>	<p>A wide ranging and creative review of how to realistically reduce the need to travel, to create polices which take the work and the shops to the people, and do not bring excessive or extra numbers of people long distances into work or shop.</p>	<p>Not accepted. These paragraphs are merely summarising the advice contained in government guidance and does not seek to set down the Council's policy on such matters.</p>
2.4.6	Peabody Unite	1817	3380	<p>This paragraph should be broadened to include the Government's housing objectives, as set out in PPG3. It should state the need to meet the housing requirements of the whole community through providing a mix of dwelling types and tenure, including key worker housing.</p>	<p>Add a new bullet point "Promote a mix of affordable housing types including key worker housing".</p>	<p>Not accepted. The paragraph has been updated to reflect the advice contained in the draft revisions to PPG3 with regard to housing in general. PPG3 does not specifically mention key worker housing.</p>
2.4.7	Mayor of London	1480	3438	<p>This section is welcome however, it should be made clear that the London Plan will eventually replace RPG3 once it is adopted.</p>	<p>Insert at the end of paragraph 2.4.7 "The London Plan will eventually replace the RPG3 when it is adopted."</p>	<p>Accepted. Reference to the adopted London Plan has now been inserted.</p>
2.6.1	The Diocese of Southwark	1703	2616	<p>To strengthen further the policy. The objectives set out under the heading 'Community Planning' should be widened to promote the spiritual & physical well being of all. As proposed the policy only recognizes some of the needs of the people in the community. It should recognizes the entire needs of the people it serves.</p>	<p>The Policy should be amended to read ". ...to promote the economic, social, environmental, spiritual & physical well being be widened to promote the spiritual & physical well of our local community."</p>	<p>Accepted in part. This whole section is to be rewritten taking on board these comments.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
2.6.4	Westow Hill Improvement Group	1614	2270	Local communities to calculate their needs??		This paragraph is proposed to be deleted (along with the section) and reworded completely. The comments will be taken into consideration in the rewording.
2.6.6	Westow Hill Improvement Group	1614	2269	Where is the consultations?		This paragraph is proposed to be deleted (along with the section) and reworded completely. The comments will be taken into consideration in the rewording.
2.6.8	South Bank Employers Group	1858	3969	In the first place, in section 2 "Background and Context" it would be beneficial in 2.6.8 to make reference also to the South Bank Partnership which covers the key Central London area between Lambeth and Southwark and the work of the South Bank Employers Group which in promoting an Urban Design Strategy for the area in partnership working between Lambeth, Southwark, Transport for London and the private and voluntary sectors through initiatives such as "Transforming the South Bank" is making a considerable input to the new plan.		Not accepted. This section is being rewritten and reference to specific groups and organisations is not necessary for inclusion.
2.7	South Bank Employers Group	1858	3970	Similarly in Para. 2.7 on "Regeneration and Community Renewal" we feel there should be specific reference to the potential for and actual plans currently being developed in relation to Business Improvement Districts in terms of capacity to make a significant impact on sustainable regeneration, the public realm and social inclusion.		Not accepted. Business Improvement Districts are not a concept used within Lambeth and as such reference to them within the UDP is not appropriate.
3	English Heritage	1655	2364	Reference is made elsewhere in the Plan to the outstanding historic environment of the Borough. This should be reflected in the overarching objectives of the Plan.	Add objective or amend objective 12 "Protecting and enhancing historic (sic) environment, particularly its outstanding historic legacy of listed buildings, conservation areas, parks and gardens and town squares, and its archaeological significance."	Accepted in part - reference to the borough's "built" environment to be included.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.1	House Builders Federation	1605	2235	It is the Human Rights Act 1998, Not 1999.	Change date	Accepted. Amend accordingly.
3.1	Bryant Developments	1805	3318	It is the Human Rights Act 1998, not 1999	Change date	Accepted. Amend accordingly.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.2	Castlebank Properties	2074	5006	<p>The overall aim of the plan is detailed at paragraph 3.2 and states:</p> <p>"To promote the sustainable development of Lambeth by making it a great place to live, visit and work, based on strong communities, better living conditions, equality and citizenship."</p> <p>While it is unclear what is meant by "great place" which is somewhat subjective or what is meant by "citizenship", the overall aim is commendable.</p> <p>The Plan's operational objectives are detailed at paragraph 3.3. Again many of the criteria detailed at 3.3.1 are commendable although the extent to which they represent "measurable objectives" is questionable when one is dealing with such matters as objective 14 "protecting and enhancing biodiversity". The concern is not the substance of objectives 1 to 16 but omissions from the list of objectives. It is noted that objective 3 reads "making best use of the borough's limited land resources"; however, making best use of the borough's built environment is not dealt with. In particular the issues of re-using building/conversions and reallocating employment and other land for housing are not dealt with. In the covering letter to these submissions I draw attention to government advice in particular the provisions of PPG3 (Housing) which was published in March 2000 and post dated the adopted Development Plan. I drew particular attention to the provisions of paragraphs 41 and 42, which read:</p> <p>Re-using buildings/conversions (Paragraph 41): states:</p> <p>"Conversions of housing, buildings formerly in other uses and the upper-floor space over</p>	<p>Additional Objectives should be incorporated at paragraph 3.31, namely:</p> <p>3a -encouraging the re-use of buildings/conversions</p> <p>3b -facilitating the reallocation of employment and other land for housing</p> <p>The above issues should also be mentioned in the tabulation at 3.55 in terms of objectives and indicator targets, which should refer to "monitoring of planning permissions".</p>	<p>Not accepted- these are policy issues rather than objectives in that they are means to an end. Also the second proposed objective fails to strike any balance with the achievement of other objectives.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

shops, can provide an important source of additional housing, particularly in town centres. Local planning authorities should adopt positive policies to:

.Identify and bring into housing use empty housing, vacant commercial buildings and upper floors above shops, in conjunction with the local authority's housing programme and empty property strategy...

.Promote such conversions, by taking a more flexible approach to development plan standards with regard to densities, car parking, amenity space and overlooking."

Reallocating employment and other land for housing (Paragraph 42)

"Some local planning authorities have allocations of land for employment and other uses which cannot realistically be taken up in the quantities envisaged over the lifetime of the development plan. Equally, since planning policies may have changed since some of this land was designated for particular land uses, it is possible that the designation is no longer compatible with policy set out in current PPG's. The government considers this is a wasted resource, especially where such sites include previously developed land. Local planning authorities should therefore review all their non-housing allocations when reviewing their development plan and consider whether some of this land might better be used for housing or mixed use developments".

It is considered that the substance of paragraphs 41 and 42 of PPG3 should be reflected in the objectives detailed at 3.31 of the Replacement Plan. It is noted at section 3.5

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.2.1	Andrew Simpson MA BA MRTPI	2043	4754	<p>"Keeping the Plan Up to date -Sustainability Performance Indicators" and includes the tabulation referring to "objectives", "indicator" and "target". Given that we are inserting objectives 3a and 3b this should also be included in the tabulation as detailed below.</p> <p>Objection to two Omissions Where did the quote come from. It is a convention to acknowledge the source of quotations</p>	<p>Suggest the addition of a new clause, to read: To seek to contribute to the creation of an environmentally sustainable pattern and form of development in London This would link in with the point made on paragraph 2.3.5</p>	<p>Not accepted. It is not a quote. There is also no need to add in the further reference suggested as this is already covered in the paragraph.</p>
Objective 3	Guy's & St Thomas' Hospital NHS Trust	1701	2633	<p>Objective 3.3</p> <p>We support the aim of promoting a healthy borough. However it would appear that the only indicator used for measurement of this air quality. We would welcome ongoing discussions with Lambeth to identify health issues on a ward by ward basis and joint working to eradicate problems.</p>	<p>Reference in plan to other health indicators.</p>	<p>Not accepted.The indicator is considered acceptable.</p>
Objective 4	Admiral Investors Limited	2167	3375	<p>In general support is given to the plan's operational objectives. However it is considered that Number 4 'Ensuring that everyone has the opportunity for a decent home and quiet enjoyment of that home and the protection of local amenity' should be more encompassing.</p>	<p>A new objective should be added that specifically addresses the Borough's housing requirements stating: 'ensuring the protection and provision of housing with specific regard to affordable or key worker accommodation thus meeting the needs of the Borough and contributing towards the overall objectives of the Mayor's spatial development strategy for London'.</p>	<p>Reference to specific targets or exact forms of affordable housing (of which key worker housing is one) is a matter for policy rather than an objective, although it is accepted that reference to a target for housing (and affordable housing) should be referred to.</p>
Objective 5	Walford Maritime Limited, Pension and Life Assurance Plan	1662	2422	<p>The term 'audit' is not defined.</p>		<p>Not accepted - The access audit would be carried out internally within the Council for major development. There is no need to clarify this within the UDP.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Objective 6	Lambeth Cyclists	1722	2743	The Plans Objectives Objectives 6 & 7 Support objectives 6 +7 to increase cycling but percentages need to be quadrupled.		Not accepted – there is not the spare capacity in the public transport system to achieve this by 2017, and it would also see more than 100% of journeys to work by public transport which is impossible.
Objective 11	NHS Executive London Regional Office	1694	2577	We object to the inclusion of the target of "No net loss of floor space in D1 community facilities use - 2002-2017". As you will be aware, class D1 includes non-residential health-care facilities. It is impossible to predict the preside impact of NHS modernization over the full life of the Development Plan period. It is clear, however, that in some form or other, the health service will need to reconfigure itself involving the procurement of new sites and buildings in hand with the disposal of surplus ones. The UDP should recognize the contribution that the NHS can make delivering sustainable forms of development through the appropriate location of health care facilities and through facilitating the release and subsequent re-use of brown-field land.	We suggest that this target be amended to clarify the need to allow for the modernization of healthcare provision within the Borough.	The target in no way prejudices this. It will be used overall rather than to judge individual planning applications. As the objector states there will be new buildings created as well as existing ones replaced.
3.4.2	Mayor of London	1480	3440	This section makes reference to the Strategic Environmental Assessment European Directive and states SEA provides a context for the environment assessment of individual projects. A reference to the EIA Regulations would add clarity to the phrase "environmental assessment of individual projects."	Add to end of paragraph 3.4.2 'as set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 1999.'	This whole section of the plan is not considered necessary for inclusion and as such is proposed to be removed. Therefore, no change proposed in response to this comment.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.5	English Heritage	1655	2365	There are no indicators/targets for measuring the performance of policies and objectives in relation to the historic environment.	<p>Include appropriate indicators/targets e.g.</p> <ul style="list-style-type: none"> - Reduction of number of listed buildings-at-risk. - Coverage of conservation appraisals/statements for conservation -Meeting outputs for grants in Heritage Economic Regeneration Schemes 	Not Accepted - the indicators included in the plan are used to test the plan as a whole; there is not a separate indicator for each policy or policy issue in the UDP.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.5.4	County Hall Owners & Residents Association	2024	4640	<p>While the principles behind this approach are laudable, this Association wishes to record the following serious reservations.</p> <p>There is an inherent weakness to the approach, both in what the Plan proposes to measure and how It proposes to measure selected criteria.</p> <p>Paragraph 3.5.4 (page 13) typifies jargon, which certainly would not receive any awards in the Crystal Clear English department.</p> <p>'Lambeth is seeking to strongly align the objectives and indicators between all of its plans. However, different Indicators may be necessary depending upon the service area the plan covers. For example, the Indicator relating to biodiversity relates to planning permissions granted, however the bio-diversity action plan has indicators relating to numbers of indicator species. In this way the impact of planning decisions on sustainability can be assessed.'</p> <p>This 'gobbledygook' suggests that it's 'horses for courses' and if you live in the wrong part of town, tough luck! In addition, two pages on, after the big table, is half a sentence containing what seems to be a 'get out' clause: 'tailored to local circumstances and resources available for monitoring'.</p> <p>Turning to the Monitoring Methodology, we would like to make the following comments, referring to the item numbers in the table (pages 13-15):</p> <ol style="list-style-type: none"> 1. There is no cross-reference, explaining 'Secured by Design' standards; neither are there policies in the Draft, which cover quality (as opposed to quantity, i.e. provision) of housing. 2. Air quality targets alone (never mind how 	<p>Review Lambeth's indicators to properly test whether the spirit and letter of the plan's objectives are being met.</p> <p>There appears to be no substitute for the kind of robust and comprehensive list of detailed standards in the current UDP. The new Plan needs to define standards because ultimately these are the only way to carry out measurements, which count.</p> <p>Phrases like 'where possible', 'unless there are good reasons...', 'where it is in the Public interest' xxxxxx reduce the integrity of the Plan because even the not so cynical see potential of a vested interest manipulating the planning process to the disadvantage of the people of who live in the borough.</p> <p>Answer the question: how does overall urban intensification have a potential negative impact on conservation and other sensitive area (3.6.5 page 16) when selective urban intensification which includes the Central Area, is not registered as having any impact on conservation and other sensitive areas?</p>	<p>Not accepted - The Council is confident that the indicators included in the Plan are an adequate test of the plans objectives and policies.</p> <p>Not accepted - Nationally such a standards based approach has been judged to have failed and to have been counterproductive in producing a quality environment.</p> <p>Not accepted - the Council considers that these statements are reasonable.</p> <p>Section 3.5.6 has been deleted.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

they are going to be measured) are not going to deliver 'a healthy borough with better health care services, reduced health inequalities, and reduced causes of ill health'. This is aside from few tangible plans to improve air quality - indeed air quality control seems to be about doing just that (and not improvements) in the face of increased and more concentrated development.

4. The selected indicators (Borough housing returns for overall housing completions and affordable housing completions in the new UDP, plus number of long term empty dwellings) will not measure how many people had the opportunity, for a decent home and quiet enjoyment of that home and the protection of local amenity;

5. Promoting access for all- the objective, the indicator and the target are not understandable, presumably this is access for those with mobility difficulty, parents with prams. In any case, 100% of developments should qualify, certainly if they are consented under this new plan.

6. Please see previous comments about the need to: reduce travel (our ref 2.3). Statistically, just measuring people who travel to work by public transport is flawed. If all the development envisaged in the new plan goes ahead, there will be more than a 20% increase in jobs in the Central London Area, and since there will be nowhere to park and congestion charging will hopefully be introduced in 2004; of course, the measurement will achieve the stated 20% target. However, this is not what the objective is all about, is it? By locating retail, leisure so exclusively in areas highly served by public transport will force more people to travel from their wasteland residential areas with no shops

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

and no leisure facilities. Leisure facilities in particular, need to be on the doorstep -not a tube or bus ride away, and certainly not contributing to already congested areas.

7. School children represent a tiny minority of transport users, particularly since most parents would wish to see their children in local school's. A mere school travel survey does not begin to cover a heading such as 'establishing a safe, accessible and attractive transport network, and prioritising walking, cycling and public transport'.

9. There are no Criteria at all for measuring how 1,000 local residents (out of +275,000) will benefit through training and access to employment measures secured through planning obligations -over a period of 15 years! Indeed, it is almost not worth the effort if only 65 people a year find jobs (probably as cleaners on minimum wage because nobody but local people could afford this type of work) as a result of the amount of development proposed in this draft.

10. The target here is very low: County Hall currently has approximately one third of its ground floor commercial units vacant, and one fifth of one third is not much at all. Never mind vitality and competitiveness...

11. Community facilities are so poor in the North of the Borough that it is difficult to envisage how these could be eroded any further, thus achieving the target 'no net loss of floor space in D1 community use .,,' The ONLY way to go is up.

12. Sorry, but only three quarters of NEW buildings meeting 'sustainable construction criteria" (whatever these may be) is not good enough. The target should be 100% of new

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
-------------------	--------------------	------------------------------	----------------------------------	----------------------------	-----------------------------------------	----------------------------

buildings, plus some more, as freeholders are encouraged to upgrade their buildings.

13. This Draft actually proposes de-designating MOL, and does not acknowledge current areas of open space. Therefore, it is difficult to have confidence in the indicator/targets suggested, particularly since there is no actual target.

14. So, what is the 'target of bio-diversity action plan'?

15. This Indicator does nothing to prevent loss of space, since respondents are merely being asked if their 'nearest' park is good, etc. A major part of the objective will depend on location and amount.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.6	Peabody Unite	1860	4057	<p>In paragraph 3.6 the Council sets out how it tested 3 strategic options:</p> <ol style="list-style-type: none"> 1. The maximisation of housing on previously developed land; 2. Prioritised and managed release of sites to housing and mixed use; and, 3. The strict protection of employment uses. <p>The Council states in paragraph 3.6.6 that the strategy to be adopted is based on selective urban intensification, prioritised and managed release of sites to housing and mixed uses, with concentration of Central London activities within the central area.</p> <p>Paragraph 3.6.5 (bullet point 4) states 'Maximisation of housing on previously developed land: performs well in terms of meeting housing objectives but poorly in terms of employment'. This presumes that all employment sites are still wholly suitable for employment purposes and does not take into consideration the changing spatial patterns of employment that makes many current employment more suitable for other purposes.</p> <p>There are ways that this can be achieved with a greater relaxation of some of the employment policies (see objections to other policies).</p>	<p>The plan's priority should be: The maximisation of housing on previously developed land.</p>	<p>This section has been deleted; however the plan continues to protect employment land where this is appropriate.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.7.4	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4850	<p>While this Para. is not in the body of the UDP, we object strongly to it and believe it should be deleted. It amounts to an aggressive policy of using/disposing of council-owned assets in order to promote development. By contrast, the paragraph merely states that the value and potential of these assets for the community "will be considered". This is grossly unbalanced. Lambeth does not have, nor is it any where near having, an Asset Management Strategy. In the absence of such a strategy, this paragraph in effect sets the tone for the UDP in terms of the use of Council assets and protection of community facilities.</p> <p>Lambeth's decisions about disposal of council assets (e.g. school buildings and land) with no apparent community benefit have been amongst the most controversial in recent years. We believe that there should be a presumption against the sale of council assets.</p> <p>Within that overall presumption, Lambeth's Community Assets Strategy should set out clearly:</p> <ul style="list-style-type: none"> -The remaining assets owned by the council; -Criteria by which decisions will be made about the disposal, management, change in status or regeneration of the council's assets; -The process by which the local community will be consulted in decisions about possible sale or other change in status of community assets. <p>In the absence of such a strategy, it is inappropriate and premature for this paragraph to appear in the background section of the UDP, where it is not formally part of the Plan. We believe the absence of an Asset Management Strategy, there should be a presumption against further disposal of council assets and this should be reflected in the UDP .</p>	Paragraph 3.7.4 should be omitted from the Plan. An amended paragraph should be included in the body of the Plan, perhaps in relation to Policy 26 on Community Facilities. See comments on this policy below.	Not Accepted – creative use of Lambeth's assets are a key component of regeneration and community renewal. A corporate asset management strategy is in preparation and the UDP must relate to it.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
3.7.8	Clapham South Neighbourhood Association	1557	2431	Needs redrafting (first Sentence) "Applications contrary to the plan [departure?] will be refused unless there are good reasons to approve the scheme." would result in complete lack of certainty with regard to any given site.	The last phrase "unless there are good reasons to approve the scheme" should be deleted as being far too wide. Possibly "other than in very exceptional circumstances such as" could be acceptable.	Not accepted as the proposed wording would be contrary to the act which allows schemes contrary to the plan where 'material considerations indicate otherwise'. The wording in the plan comes from a government 'plain english' version of the statutory provision.
3.8.15 should be 3.7.15	J Clyne	1824	3610	As stated the policy encourages development without consent.	Reword 3.18.15 to: "where unauthorised development is carried out vigorous enforcement action will be taken".	Not accepted - This is beyond Lambeth's powers. In each and every case it must justify enforcement action, on the basis that planning permission would not have been granted and that it is in the public interest to take action. It cannot be issued automatically.
Lambeth Key Diagram	Brockwell Park Management Advisory Committee	2028	4639	Camberwell Green and Herne Hill are both referred to as District Centres shared with adjoining boroughs and shown on the Lambeth Key Diagram (4.2) which also shows Brixton, Loughborough Junction, Vauxhall and Elephant and Castle as TDA's. Only Brixton and Streatham are considered as Major Lambeth Town Centres. There is no reference to a new Camberwell Railway Station. -There should be		Brixton and Streatham are the major town centres. Camberwell Green and Herne Hill are also district centres shared with adjoining Southwark borough. The aforementioned have been indicated on the map (Key Diagram). TDA's outside of the borough have been acknowledged where they are of a significant scale I.e. of a scale that may impact on the borough. Camberwell Green is not considered to be of this scale and has therefore not been included. Map has been redone.
Policy 2	Coin Street Community Builders	1589	6330	We do not understand what is being proposed. What does "promoted for development as part of a network of central London communities south of the Thames" mean ? What relation does this have to the Louis De Soissons quotation in 4.4.2 ?		Not accepted - no change. The statement is self explanatory and has no direct relationship to the quote.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Table 2	National Car Parks Limited	2117	5300	With reference to Table 2 (Central London Supporting Activities) under 'Transport' we suggest the examples of appropriate supporting activities should include off street public car parking facilities.		Not accepted - no change. One objective of the plan is to reduce the car journeys - the inclusion of public car-parks as a supporting use would therefore be inappropriate.
Policy 4	Coin Street Community Builders	1589	6326	We support the idea of Waterloo having "a wide range of shopping, services, leisure, entertainment and other facilities, available to all sections of the community". If that is what is meant by Table 3's support of "the transition of Waterloo to become the major town centre for the north of the borough", we also support that. What we find difficult to understand is the definition of Waterloo District Centre, which refers specifically to Lower Marsh, The Cut and York Road but does not refer to Cornwall Road (north of Stamford Street), the South Bank Centre and Waterloo Station itself, which appear to be envisaged as forming part of the Waterloo Town Centre.		The concept of expanding the centre of Waterloo to become a sustainable major town centre is one that the Council can foresee in the future, however for the present it hinges on the redevelopment of Waterloo Station. This currently creates a barrier between the historic centre at Lower Marsh and other central London facilities on the South Bank. There are no clear connections between the two. Moreover, the centre of the Lower Marsh district centre is also concentrated within Lower Marsh with some reach on to Waterloo Road and Westminster Bridge Road. These also act as delineating the boundaries of the centre, for which additional town centre uses on the Cut and Westminster Bridge Road south side become edge of centre. In short, there is the scope for Waterloo to become a major centre but it would be presumptuous of the plan to acknowledge it as such outside of what national guidance considers to be such a centre (more than 50k sq.m. retail). Should the redevelopment of Waterloo Station become more tangible then the centre boundaries could be reconsidered and revised. This does not preclude the development of other central London uses in the area which would also be considered under Policy 3 - The Central London Policy Area.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 5	Tesco Stores plc	1577	6393	Policy 5, Section (f) states that major applications (eg. 1000 sq.m GFA plus) should be accompanied by a combined retail, economic and transportation impact assessment. The Guideline of 1,000 sq.m is an extremely low level of floorspace to require consideration of these issues in such detail. Government Guidance at PPG6 suggests that applications over 2,500 sq.m should consider retail and transport issues at this level.	Policy 5, section (f) should read as follows: 'Major applications (ie 2,5000 sq.m GFA) should be accompanied by a combined retail, economic and transportation impact assessment.'	Accepted - this will not be the case. The baseline for economic/transport evaluation will be 2500sq.m. or proposed developments that are inconsistent in scale, character or function with the centre in which they are proposed. This will be in line with national guidance and the London Plan.
Policy 5	Tesco Stores plc	1577	6392	This policy is too prescriptive. It does not reflect the role of individual centres and if interpreted strictly will not secure the terms of Policy 4, which seeks a pattern of shopping in Lambeth to meet consumer needs. This is particularly the case if the Council's interpretation of the sequential approach is that retail development should be directed towards larger centres as a first priority.. This does not reflect the terms of PPG6.	The policy should state: 'Proposals for major retail development should normally comply with the sequential approach. This means that first preference should be for town centres, followed by edge of centre sites, district and local centres and only then out of centre sites in locations that are accessible by a choice of means of transport.'	Part accepted - the policy will be changed to reflect national guidance that development appropriate to the scale and function of the centre will be acceptable alongside the sequential approach (that will apply where development proposals are not appropriate for the scale and function of the centre for which they are proposed.) This will bring the policy closer into line with Policy 4 and national guidance.
4.6.11	Tesco Stores plc	1577	6395	Paragraph 4.6.11 states that applications for major development to which the sequential approach applies of over 1,000 sq.m gross should be accompanied by a combined economic and transport evaluation. This is a low level of floorspace to consider this requirement, and is inconsistent with Government Guidance.	Paragraph 4.6.11: 'All applications for major development to which the sequential approach applies of over 2,5000 sq.m gross should be accompanied by a combined economic and transport evaluation.'	Accepted - this will not be the case. The baseline for economic/transport evaluation will be 2500sq.m. or proposed developments that are inconsistent in scale, character or function with the centre in which they are proposed. This will be in line with national guidance and the London Plan.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 7	Tesco Stores plc	1577	6396	This policy refers to the need to protect residential amenity, referring to incompatible non-residential uses, without stating what these might be and the need to control non-residential uses relative to other residential uses. There is no indication of the method of control which will be applied and as a consequence this policy has an uncertain meaning.		Not accepted - the policy deals with residential amenity in an open-ended way. There is no need to try to list either incompatible developments or benchmarks of residential amenity, as both of these will change in time. Most protection of residential amenity is covered by the Human Rights Act 1998, particularly Article 8 of Part 1 and Article 1 of Part 2. Recourse would also be had to available information such as environmental records of noise, odours etc, however it would be imprudent to limit this to a list as all available information would be utilised.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
4.9	General Aviation Awareness Council	1428	5322	<p>1.0 Introduction</p> <p>1.1 This representation is submitted by the GAAC which is a consortium comprising GA associations, aerodrome operators, flying training organisations, oil companies and other bodies.</p> <p>1.2 It has been submitted in order to request inclusion of a policy relating to helicopter activity within the Unitary Development Plan area.</p> <p>2.0 General Aviation (GA) – background information</p> <p>2.1 General Aviation (GA) which, with Aerial Work (AW), covers all civil aircraft activity other than that carried out by the commercial air transport (CAT) sector, is the largest part of the UK aviation community. Whilst the CAT sector operates about 850 aircraft and uses 25 airports, the GA fleet exceeds 8,500 conventional aircraft, including helicopters, and extends to 12,500 if gliders, microlights and balloons are included.</p> <p>2.2 The number of GA aircraft represents a growing proportion of the total aircraft on the UK register. GA in the UK uses 143 aerodromes licensed by the Civil Aviation Authority (CAA) and more than 350 unlicensed flying sites.</p> <p>2.3 GA tends to be viewed as primarily being a leisure based activity. However, some 85% of filled seats on commercial airlines are occupied by people flying for leisure purposes whilst more than 70% of flights carried out by GA/AW have some business or safety connotation. These include business flights, pipeline work, police and pollution patrols, traffic surveys, medical flights, newspaper and postal flights,</p>		Not accepted - The London Heliports Study, as commissioned by the Department of Transport, looked at a number of potential sites in London, however none were found suitable in London.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

aerial surveys, civil search and rescue operations and pilot training.

2.4 The airline industry also depends very heavily on GA to provide a supply of new junior pilots, many of whom start by learning to fly for pleasure and who later decide to opt for flying careers. These people, most of whom train at their own expense, must be able to fly without undue restrictions, from aerodromes that are within easy reach of their homes or their places of work.

3.0 Central Government guidance

3.1 Paragraph 5 of Annex B of PPG13 advises that Local Planning Authorities will need to consider:

The role of small airports and airfields in serving local business, recreational, training and emergency services needs. As demand for commercial air transport grows, this GA may find access to larger airports increasingly restricted. GA operators will therefore have to look to smaller airfields to provide facilities. In formulating their plan policies and proposals, and determining planning applications, local authorities should take account of the economic, environmental and social impacts of GA on local and regional economies.”

This advice, which is also applicable to helicopter sites, endorses inclusion of an appropriate development plan policy.

4.0 Suggested policy

4.1 We appreciate that this is primarily an urban area and realise it may be inappropriate to incorporate a policy relating to fixed wing flying

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

sites. However, many urban authorities do recognise the need to carefully consider helipad/heliport proposals and incorporate policies accordingly.

4.2 A balanced policy would recognise the disbenefits (the most obvious being potential noise/disturbance) and balance this against the benefits arising. General Aviation, including helicopters, can play a vital role in several ways:

(i) It forms an essential element in the overall transport infrastructure.

(ii) It brings considerable economic benefits to an area in assisting the functioning of businesses and fostering links with other parts of the country and Europe.

(iii) It broadens the range of recreational facilities available in the area.

(iv) It assists services such as the public utilities, police, statutory undertakers (for survey work) and medical services (for organ donations etc).

(v) It assists pilot training.

These positive aspects are frequently overlooked and should be afforded consideration in development plan policy as part of a balanced approach.

4.3 The following type of policy is suggested for inclusion within the Unitary Development Plan, to provide clear guidelines to any potential operator who may wish to establish a landing strip or heli-pad within the London Borough of Lambeth. Clear criteria help both potential applicants and Local Planning Authority officers in determining an application, in accordance with s.54a of the Town and Country Planning

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>Act 1990.</p> <p>4.4 "The establishment of flying sites for all types of aviation activity, or changes to operations at existing sites, will be considered on their merits having regard to the following:</p> <ul style="list-style-type: none"> i) The economic and employment advantages arising. ii) The broadening of the range of recreation provision available within the Borough. iii) The likely impact upon residential and other noise sensitive properties in the immediate vicinity (i.e. under flight paths and circuits), by virtue of noise and disturbance. iv) The locational benefits to public services. v) <input type="checkbox"/>The site's role in the overall transport infrastructure of the Borough, having regard to site access and sustainable development issues. vi) <input type="checkbox"/>Visual impact. vii) <input type="checkbox"/>The impact on nature conservation interests. <p>Having regard to Government advice, in PPG13 and PPG24 in particular, restrictions upon the number, type and times of movements would be the subject of conditions attached to any grant of permission as required in the specific circumstances of the case."</p> <p>4.5 Please include a GA related policy in the Unitary Development Plan.</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 8	Tesco Stores plc	1577	6397	<p>Policy 8, section (d), states that any application for development with transport implications should incorporate proposed traffic reduction, restraint and management measures to mitigate the impact of the development on the surrounding road network. It also notes that measures to promote traffic reduction and management, including travel plans will be expected of developers.</p> <p>The requirement to incorporate proposed traffic reduction, restraint and management measures, including the production of travel plans, should only be required where the proposed development has been shown to have an adverse impact on transport levels as a result of the development, either individually or cumulatively with other developments.</p>	Policy 8, section(d): 'any application for development with demonstrably adverse transport implications should incorporate proposed traffic reduction'	Not accepted - each application will be assessed on its merits with regard to this policy.
Policy 8	Coin Street Community Builders	1589	6343	<p>Whilst we understand the desire to encourage developers to locate near to good public transport, we feel that the plan and indeed the Major's emerging strategy are flawed in that they should be seeking to improve public transport outside central London rather than continuing to encourage employment developments to cram into London with its existing transport hubs. The logic of what is being sought – in terms of access to employment and the reduction of the need to travel – would be to encourage major development uses to locate outside central London and to encourage more housing within central London. In this matter we support the proposal made in 4.9.20 'to provide... an enhanced orbital transport network around central London.'</p>		Comments noted - it is unclear what particular changes are sought.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 9	Tesco Stores plc	1577	6398	This policy is too restrictive. Many parts of London are already congested, including areas within Lambeth and certain development proposals will need to consider the management of congestion. If the policy was interpreted literally, appropriate development in appropriate locations may be refused if they add in any way to congestion, This would have the potential to stifle appropriate development.		Not accepted - the policy provides a framework against which to assess development applications. It is not considered this will stifle appropriate development in appropriate locations.
Table 5	Fairview Homes Ltd	1752	2978	Whilst we support the principle of the note at the bottom of Table 5, that such measures should be "necessary for the scheme to go ahead and related to the development", the wording of this note should more closely reflect the guidance set out in Circular 1/97, Planning Obligations.	The note should state "... necessary for the scheme to go ahead and fairly and reasonably related to the development "	It is considered unnecessary to include the proposed additional words. The policy will operate within the context of national guidance regarding planning obligations.
Policy 10	Tesco Stores plc	1577	6399	This policy requires development proposals to have regard to walking and cycling facilities. This may not always be appropriate and rather than being a requirement, should be dealt with by way of encouragement. The policy should be amended accordingly.		Not accepted - each application will be assessed on its merits with regard to this policy. It is not considered any amendment is required.
Policy 11	Tesco Stores plc	1577	6400	This policy is too onerous, particularly where a new access might be beneficial for the highway network or where it may result in consolidation of existing access points. As a consequence, the policy should be amended accordingly.		Not accepted - The TLRN comprises major traffic routes. Their prime use is to distribute traffic throughout London, not to provide access. Notwithstanding, all applications will be assessed on their merits with regard to this policy.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 12	Tesco Stores plc	1577	6401	This policy is too restrictive, with onerous requirements for development. For instance, it refers to "the highest" standards of interchange between modes of travel, where in practical terms this may not be appropriate. It goes on to specify the types of uses that might be appropriate in these locations, which is better done elsewhere in the plan under separate sections dealing with these individual sites. This policy should refer to the principle of strategic transport hubs and transport development areas, rather than specific land uses.		Not accepted - it is not considered the policy is too onerous, however, further clarification has been provided regarding Transport Development Areas.
4.9.21	Coin Street Community Builders	1589	6333	Housing developers should not have to contribute to improvements in public transport - such requirements will result in less housing being built.		Not accepted - no change. It is appropriate that planning benefits are required to make development which would otherwise be unacceptable, acceptable. The Council considers that this will not result in less housing coming forward.
4.9.21	Coin Street Community Builders	1589	6349	Developers of housing in central London should be excluded from having to make contributions to improve transport facilities since new housing reduced the need to travel. To that extent we object to Policy 12 – Strategic Transport Hubs and Transport Development Areas – until this issue is dealt with.		Not accepted - it is considered reasonable that relevant contributions may be sought to improve transport, where necessary, and where fairly and reasonably related in scale and kind to the proposed developmen, in accordance with National Guidance.
Policy 13	Tesco Stores plc	1577	6403	It should be confirmed that developer contributions to major public proposals should be equitable, and that there will be a system put in place by the Council to ensure that this is the case.		Noted - it is intended that all planning obligations are reasonable and relevant, with regard to national policy and relevant law.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 13	Clapham Park Project - New Deal for Communities	1846	3811	<p>All the infrastructure projects are excellent in principle, and we offer our enthusiastic support. At the same time, however, they do little to alleviate the plight of the many who live in areas of "poor transport accessibility" -Clapham Park included. It is very much a case of "the rich get richer". There needs to be some more serious thinking around this issue.</p> <p>The realigned Cross River Transit (CRT) route proposed from Waterloo to the Oval via Vauxhall, would probably be an improvement -it would give better access to St. Thomas's Hospital, for example.</p> <p>At Vauxhall itself, consideration should be given to taking CRT directly from Albert Embankment into Harleyford Road, otherwise it risks being held up by having to go through too many sets of traffic lights.</p> <p>After Stockwell, LBL should reconsider supporting a route via Clapham (to relieve the vastly overcrowded Northern Line) then along the South Circular, then turning into Streatham Hill. A branch could go on to Tulse Hill, which would at the same time provide a short-working facility.</p> <p>At Streatham, the line could go through Norwood to link up with the Croydon Tram Link. The turning loop at Streatham may not then be necessary, unless operational requirements dictate another short working point. The Proposals Map has no alignment south of Streatham. In any event, CRT should be completely compatible with the Croydon system, so as to allow through running.</p> <p>Whilst we understand the arguments in favour of the alignment via Brixton, we understand the preference has been made on the basis of</p>	<p>To review the proposal CRT route alignment in relation to recent and future demographic changes and help overcome "areas of poor transport accessibility" such as the Clapham Park Project NDC area, as detailed above.</p>	<p>At the request of the Mayor of London, the proposed route to be shown is his proposed route determined following consultation. These matters should be raised with Transport for London. Lambeth strongly supports extensions of the tram in the future to Clapham and Streatham.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 13	Councillor David Malley	1856	3949	<p>surveys and population statistics seven years old. We are concerned that recent and projected demographic changes are fully taken into account. The "nappy valley" effect and planned increased residential population needs to be considered in relation to the demand for good transport in the "areas of poor transport accessibility". The ideal, of course, would be a "both/and" scenario: Brixton and Clapham. LBL should note that TfL's referred alignment to Peckham precisely cuts through a large area of poor transport accessibility.</p> <p>In general this policy is a good one, but I feel the provision of tram roads to Streatham do not, literally go far enough.</p> <p>1) The tram/ cross river transit should reach the Streatham hub; this will aid easy change over and encourage public transport use. At present the route marched terminates north of the hub.</p> <p>2) The route should extend all the way to the borough boundaries in Streatham South. This will aid link up with the Croydon from and improve public transport in Streatham south.</p>	<p>As, implied above, please amend map accordingly.</p> <p>I realize the A23 is narrow at St Leonard's but the A23 in general is very wide-ideal x-river transit territory.</p> <p>The need for one major structure e.g. a tunnel should not be a different to southbound extension.</p>	<p>At the request of the Mayor of London, the proposed route to be shown is his proposed route determined following consultation. These matters should be raised with Transport for London. Lambeth strongly supports extensions of the tram in the future to Clapham and Streatham.</p>
Policy 13	Darren Sanders	1976	4531	<p>I object to the route shown on the proposals map and clarified in 4.9.23. The route does not maximise the regeneration benefits, ignoring as it does Clapham Park, and the NDC regeneration project in it. Although overcrowding on the Northern Line south of Stockwell and the lack of public transport accessibility shown for this area in map 1 argue the case for the line go parallel to the northern line from Stockwell to Clapham South, along the South Circular and through the NDC area to Streatham Hill and down to the Streatham Hub.</p>	<p>I would alter the key diagram to reflect the above alignment, delete with potential longer-term extension to Streatham in policy 13 and include after 'benefits' in 4.9.23 line 8, insert 'such as the Clapham Park NDC'.</p>	<p>At the request of the Mayor of London, the proposed route to be shown is his proposed route determined following consultation. These matters should be raised with Transport for London. Lambeth strongly supports extensions of the tram in the future to Clapham and Streatham.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 13	Vauxhall Society	2112	5243	Major public transport improvements are badly needed. They should be routed to improve transport in badly served areas and to increase connections. The Cross River transit should connect existing transport, including many of the tube stations it is proposed to connect with, but it should not duplicate the route of the Northern Line where there are nearby communities that need it. It should be routed to serve Lambeth Walk. Trams can go down fairly narrow roads which do not have heavy traffic as sharing works there.	Substitute 'a route fairly close to the preferred alignment, shown on the proposals map, will be determined by local consultation and serving communities, including Lambeth Walk, which are badly served by existing tube and bus routes' for the text in brackets in line 3.	At the request of the Mayor of London, the proposed route to be shown is his proposed route determined following consultation. These matters should be raised with Transport for London. Lambeth strongly supports extensions of the tram in the future to Clapham and Streatham.
4.9.23	Coin Street Community Builders	1589	6353	The route for the Cross-River Transit should be designed to maximise regeneration benefits and should not be determined by, 'the scope for developer contributions'.		Comments noted. At the request of the Major of London, the proposed route to be shown is his proposed route determined following consultation. These matters should be raised with Transport for London.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 14	Tesco Stores plc	1577	6404	<p>Policy 14 (table 6) puts forward a standard of 1 space per 50 sq.m gross floor area (GFA) for food retailing. This is significantly at odds with national policy, and the standard contained within PPG13 of space per 14 sq.m and is overly restrictive.</p> <p>PPG13 incorporates the principle of parking restraint, also recognising where retail developments are located in town centres or on the edge of centres, local authorities should consider allowing parking additional to the relevant maximum standards.</p> <p>The Lap's proposed standards draw no distinction between different types of retail use, intending to apply the same standards to A2, A3 and D2 facilities. These are vastly different uses which have different car parking requirements.</p> <p>The UDP states that control of the parking supply is a prime tool for traffic restraint and environmental improvements but gives no reason why a far more onerous maximum parking standards than contained in PPG13 is to be adopted. When the draft standards are compared to the standards for adjacent boroughs it is quite clear that Lambeth is unique in seeking a standard at 1 space per 50 sq.m. with Wandsworth, Croydon, Merton and Bromley all having standards of approximately 1 space per 20 sq.m. and Lewisham 1 space per 14 sq.m.</p> <p>The practical effect of adopting draconian standards for retail facilities include limited parking resulting in people parking on-street, adjusting the time they stop or continue to use existing stores. This will have an effect on surrounding roads, will not reduce the number of private car trips (one of the key aims of</p>	<p>Policy 14 and in particular Table 6, should adopt parking standards in line with Central Government Guidance and PPG13, except where individual circumstances indicate that a higher or lower standard would be appropriate.</p>	<p>Not accepted - PPG13 clearly states that local planning authorities may adopt more rigorous standards than those in Annex D to PPG13. Council is proposing to apply the standards in the UDP, to seek to reduce reliance on the private car as a means of transport, as well as to address problems regarding traffic growth and congestion.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				PPG13) and will result in no potential saving of journey length created by new stores, again an objective of PPG 13.		
				The UDP does not properly consider the likely detrimental effects of the draconian standards proposed, which will be counter productive to the broader aims of Government Policy to reduce the need to travel, especially by car.		
Policy 14	Nicholas Long	2248	5204	Traffic restraint policy fails to have any regard to local authority's overriding requirement to take account of Crime and Disorder Act 1998 Traffic restraint involving road closures where barriers are placed across roads to prevent through traffic should be carefully designed so as to prevent (unintended) increases in Crime, particularly Street Crime and Burglery	<ol style="list-style-type: none"> 1. Consultation with local (not traffic only) police. 2. Any gate, barrier or other physical obstruction to be designed in such a manner so as not to impede police pursuit in vehicles. 3. Survey work to be undertaken in relation to each traffic restraint proposal to asses possible impact on crime levels. 	Not accepted. This is too detailed for inclusion in the UDP.
Table 6	Walk First in Lambeth	2118	5308	Encouragement needs to be give to vehicles using low or zero emission vehicles. Vehicle emissions are known to damage peoples health. Particulates are associated with asthma and lung disease. Oxides of sulphur and nitrogen are irritants as is ozone. 1-3 Butadiene is a known carcinogen. Furthermore, carbon dioxide is the major contributor to greenhouse warming and climate change. Pedestrians are particularly vulnerable. However the UDP seeks to promote walking especially along well used roadsides. The government is seeking to promote conversion to environmentally friendly vehicles thought the Powershift programme. The UDP could give a significant boost to use of these vehicles through appropriate e provision of car parking space. This could be done by providing quotas in larger car parking areas. These could be reviewed periodically as take up increases. The table should be modified as shown below.	Retail , Theatre and Leisure, Community Facilities column 1: half disabled provision column 2 and 3: 0.04 space per 50 sq m GFA where the calculation is for less than one space the provision will be zero.	Not accepted - the regulation of vehicle emissions is beyond the control of the UDP.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 15	Tesco Stores plc	1577	6405	<p>Policy 15, section (B) states that unless the plan expressly promotes, allows or protects other uses, housing should be the pre-dominant use on sites coming forward for development.</p> <p>This policy should be more balanced in respect of ability of other land uses to be appropriate on particular sites, even though they may not be subjective allocations. The policy should be phrased on the basis that residential use will be encouraged on specific sites where appropriate.</p>	<p>Policy 15, Section (B) should state: "Residential uses should be incorporated where possible on sites coming forward for development..."</p>	<p>Not accepted - no change. The objective of Policy 15 (B) is to positively promote the creation of additional dwellings in the Borough. The intention of the policy is to create a development planning context in which housing is encouraged, almost as a default. Unless other specific policies favour another use, housing will be expected to be the predominant use. The change suggested by the objector would be less positive and would not achieve this objective which has received widespread support, and would not make it clear that housing should be the predominant use on development sites.</p>
Policy 15	Coin Street Community Builders	1589	6332	<p>We have concerns that the various demands placed on housing developers will mean that limited housing will be built in Lambeth and that the housing targets will not be met. In particular, we object to housing developers having to contribute to improvements in public transport.</p>		<p>Not accepted - no change. It is not clear whether the objector is proposing to reduce the housing target or to abandon efforts to secure appropriate planning benefits from development schemes. Assuming the later, it is entirely appropriate that the Council secures planning benefits which make otherwise unacceptable developments acceptable.</p>
Policy 15	Mr Mark Brown	1827	3636	<p>We support the general presumption in favour of housing development in the Borough. However, we object to Policy 15 on the basis that it provides insufficient flexibility to meet future market demand requirements. The housing mix promoted should not be unreasonably restrictive, and should allow for the consideration of particular site characteristics and circumstances.</p>		<p>Not accepted. Policy 15 relates to all housing types and the Council considers that it is appropriate to seek to secure a mix of dwelling types on all sites over 10 dwellings. This accords with PPG3 that requires the creation of mixed communities that offer a choice of housing whilst avoiding large areas of housing of similar characteristics.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 15	Groveville Ltd	1863	4080	<p>We welcome the approach of Policy 15 which states that housing should be the predominant use on sites coming forward for development.</p> <p>(A) Section (C) refers to sites capable of developing 10 or more residential units and states that there will be a requirement to provide a mix of dwelling type, affordability and size of unit depending upon local circumstances and site characteristics. This policy as proposed should be deleted and the approach to affordable housing and threshold reconsidered. The proposed policy is out of step with current national guidance and pre-judges the outcome of the consideration of affordable housing policy in London. This is currently the subject of research and assessment by the Government Office for London and the Mayor and the Greater London Authority. No decisions have been made about the detail of London-wide affordable housing policy and it is premature for the Unitary Development Plan to be altered at this stage. Whilst the need for affordable housing is clearly recognised, the Policy context set by national guidance, strategic policy and local policy must be consistent, especially when a review of the development plan is being undertaken.</p> <p>(B) Notwithstanding this fundamental objection, we make further detailed comment as follows:- There is no evidence that a reduction in thresholds and the proposed increased proportion of housing will serve to increase the total housing supply and the affordable housing supply in particular. There is a real risk that such policies will prove to be counter-productive and this is the very issue that has resulted in the detailed research to which we refer above. The research carried out by the Greater London Authority (Three Dragons) has been challenged directly and remains to be proven. It is not a</p>		<p>(A) Not accepted. Policy 15 relates to all housing types and the Council considers that it is appropriate to seek to secure a mix of dwelling types on all sites over 10 dwellings. This accords with PPG3 that requires the creation of mixed communities that offer a choice of housing whilst avoiding large areas of housing of similar characteristics.</p> <p>(B) Not accepted - this would only occur if the policy applied in an inflexible way Schemes which are shown to be unviable with a given level of affordable housing will have the % of affordable housing reduced accordingly.</p> <p>(C) Not accepted - affordable housing will be required on sites over the threshold unless and exception is justified. It is not appropriate to define the size/type/mix required as this will be considered on a site-by-site basis taking into account local circumstances and local need/demand.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>basis on which a Unitary Development Plan policy can yet be formulated.</p> <p>(C) As drafted, the Policy and reasoned justification lack clarity in defining the criteria to be applied in judging when affordable housing is to be sought and on what basis. Similarly, it is appropriate to provide criteria for defining the likely mix of dwelling type which will be required. Any threshold creates anomalies and consideration needs to be given to a sliding scale of provision to avoid the artificial suppression of development below a threshold because of the excessive opportunity cost created when just crossing the threshold. The Policy in the reasoned justification should recognise the other factors which need to be taken into account such as those set out in Circular 6/98.</p>		
Policy 15	St George South London	2052	4847	<p>Part C of this policy states that the Council will require a mix of dwelling types or sizes on small sites of 0.1 ha or more or sites of 10 or more units. As this will not always be appropriate or practical, the words "will be required" are therefore inappropriate in this policy and should be deleted. Furthermore, the policy states that affordable housing is to be included as part of the overall mix of 10 or more units or on sites of 0.1 ha or more, an inclusion which is contrary to the provisions of Circular 6/98. Please refer to our separate representation addressing the proposed thresholds for the provision of affordable housing.</p>	<p>Part C of policy 15 should be amended to delete the words "affordability" and "will be required", to read as follows:</p> <p>"a mix of dwelling type and size of unit will be sought, having regard to..."</p>	<p>Not accepted - no change. "Will be sought" is weaker than Government policy in PPG3. The policy appropriately refers to affordability - Government guidance requires the creation of mixed communities that offer a choice of housing while avoiding large areas of similar housing.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 15	Castlebank Properties	2074	5007	<p>Policy 15 entitled "Additional Housing" states at (B) Priority in Favour of Housing:</p> <p>"Unless otherwise stated in the Plan housing is a suitable use on all sites which can provide a suitable residential environment for existing and future residents, having regard to supplementary planning guidance. Unless the Plan expressly promotes, allows or protects other uses, housing should be the predominant use on sites coming forward for development, providing that realistic opportunities for new or improved community facilities, for which there is a local shortage or deficiency, on part or all of the site or elsewhere, are not foregone. Pro-active planning powers will be used to bring this into effect.</p> <p>In particular conversions and reuse of empty buildings will be promoted, unless retention of viable uses is protected by other plan policies, where a more flexible approach towards development standards will be applied, subject to maintenance of a quality residential environment."</p> <p>We would strongly support the contention that housing is a suitable use on all sites which can provide a suitable residential environment for existing and future residents. Before commenting further I would like to receive a copy of the "Supplementary Planning Guidance" referred to at Policy 15 (B) and confirms that it is in accordance with the provisions of PPG1 General Policy and Principles and PPG3 Housing. I would draw particular attention to the substance of paragraph 2 of PPG3 Housing which states that local planning authorities should make more proficient use of land by reviewing planning</p>	The policy should be changed to accommodate the above concerns.	Not accepted. Policy 15 relates to all housing types and the Council considers that it is appropriate to seek to secure a mix of dwelling types on all sites over 10 dwellings or sites of over 0.1Ha. This accords with PPG3 that requires the creation of mixed communities that offer a choice of housing whilst avoiding large areas of housing of similar characteristics.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>policies and standards.</p> <p>I would also draw attention to bullet points attached to paragraph 56 of PPG3 Housing which states that:</p> <p>"Local Planning Authorities should adopt policies which:</p> <p>.Avoid inflexible planning standards and reduce road widths, traffic speeds and promote safer environments for pedestrians.</p> <p>In dealing with the matter of "supplementary planning guidance" referred to at Policy 15 (B) one also needs to have regard to the provisions of PPG1 General Policy and Principles, which reads:</p> <p>"Local Planning Authorities and Developers should adopt a realistic approach to achieving mixed use development. In order to encourage mixed-use development, local planning authorities may need to adopt a flexible approach to planning standards, including, for example, the level of parking provision required and allowing increased densities, while having regard to the availability of alternative modes of transport, residential amenity and the needs of local businesses."</p> <p>It is important that the substance of PPG3 is reflected in Policy 15 Addition Housing, including Policy 15 (B) Priority in Favour of Housing and paragraph (C) Housing Mix. It is considered that reference to 0.1 hectares in policy 15 Additional Housing and elsewhere maybe too small a site area. By way of example I would refer to the development at 1 Chestnut Road to examine the practicality of the Councils aspirations in relation to this policy. The reference to 0.1 hectares is inappropriate and</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
-------------------	--------------------	------------------------------	----------------------------------	----------------------------	-----------------------------------------	----------------------------

does not reflect government advice, as outline in these submissions.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 16	Tesco Stores plc	1577	6406	<p>Policy 16, Section (A) states that the affordable housing policy applies to sites and buildings capable of providing 10 or more units gross or 0.1 Ha or more in size (irrespective of the number of units).</p> <p>This is at odds with Circular 06/98 - Planning and Affordable Housing, which states that it will be inappropriate to seek any affordable housing on some sites. In practice the Policy should only be applied to suitable sites, namely in inner London, housing developments of 15 or more dwellings, or residential sites of 0.5 Ha or more, irrespective of the number of dwellings.</p> <p>Policy 16, Section (B) indicates that normal expected level of provision will be 50% of habitable rooms unless it is demonstrated that a scheme would not be economically viable unless there is a lower level of provision.</p> <p>Circular 06/98 states that affordable housing policies in local plans should indicate the intention to negotiate with developers for the inclusion of an element of affordable housing on such sites. Also, indicative targets can be set for specific suitable sites. However, it does not suggest a blanket figure to be stated within the Policy to which all sites should adhere. It may be appropriate to include an aspirational figure within the supporting text to any policy. Indeed, Circular 06/98 notes at section 10 that care is needed in determining the proportion of affordable housing in the overall numbers on site, and in implementation and subsequent management of the affordable housing element, in order to achieve a successful housing development.</p> <p>Policy 16, Section (F), notes a number of criteria which should be met when more than 15% of the proportion of units is proposed as</p>	<p>Interms of Policy 16, Section (A), the site size to which the plicy applies should be in accordance with Circular 06/98, being housing developments of 15 or more dwellings, or residential sites of 0.5 Ha or ore.</p> <p>In terms of Policy 16, Section (B), the policy should state that intention of the LPA to negotiate with developers for the inclusion of an element of affordable housing on certain sites. An aspirational figure of 50% may be included in the supporting text, in the consideration of need for additional affordable housing in the borough.</p> <p>In terms of Policy 16 Section (F) a definition of key worker housing should be included, and clear indication of when this will contribute to the affordable housing content required on certain sites.</p>	<p>Partly acceted - changes proposed.</p> <p>The Council recognises that the threshold included in the proposed policy is at odds with Circular 6/98. However, the Council considers that given the circumstances of the supply of additional housing land in Lambeth, and the continued unmet need for affordable housing, the lower threshold is necessary. The Council acknowledges that it will be inappropriate to seek any affordable housing on some sites, and the policy allows less to be provided (possibly none) if the developer demonstrates that a given level is unviable.</p> <p>Unless the Council makes it clear in the policy that the normal expected level of provision of affordable housing will be 50% (or 40% with no subsidy) it will stand little chance of achieving its target for additional affordable housing. It is desirable that the ppan offers certainty about the Council's approach and the proposed policy does that.</p> <p>Part F (l) of the Policy indicates that key worker housing should "be for and involve the support and participation of, named employees of key public services experiencing and providing evidence of, problems of recruitment and/or retention" Changes are proposed to the wording of the first part of section (F) which will make it clear that "key worker" housing will be part of the affordable element of a scheme (meeting the definition of affordable housing), and that it is one type of intermedaite housing.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 16	Coin Street Community Builders	1589	6338	<p>"Key Worker2 housing.</p> <p>Notwithstanding the criteria listed, no definition is given of Key Worker housing, and whether all types of key worker housing would be considered affordable housing, in terms of meeting the Council's requirements for a proportion of affordable housing on various sites.</p> <p>Policy 16 (F) - we object that key worker housing should necessarily "be for....named employers of key public services" which simply does not reflect the variety of needs in central London nor the changing patterns of work and methods of providing public services. Is this intended to suggest that housing provided for BBC staff is "key worker housing" but not that for LWT staff ?</p>		<p>Not accepted - no change. The Council must prioritise the allocation of scarce provision for key workers and the proposed text reflects those priorities. The distinction drawn by the objector between BBC and LWT workers is unhelpful, and the policy will be applied in a flexible way.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 16	Laing Homes	1672	2487	<p>Part (A)</p> <p>The current drafting indicates that the policy applies to sites capable of providing 10 or more units gross, or 0.1 ha or more in size. We object to these thresholds on the basis that they are significantly below those recommended by central government as set out at paragraph 10(i) of DETR Circular 06/98 "Planning and Affordable Housing". The guidance indicates that for Inner London affordable housing should 'only be sought on housing developments of 15 or more dwellings or residential sites of 0.5 of a hectare or more. The guidance makes clear that with the exception of settlements in rural areas with populations of 3,000 or fewer, the Secretary of State does not consider that it is appropriate for local authorities to seek to adopt thresholds below the lower level of 15 dwellings or 0.5 of a hectare. Furthermore, the guidance recognizes that it may not be appropriate to seek affordable housing provision in every instance. Regard must also be had to site suitability and economics of provision. Issues such as proximity to local services and access to public transport and whether there are particular costs associated with the development of the site should be taken into account.</p> <p>We consider that the Council should adopt the thresholds as set out within Circular 06 / 98. Reference should be made to negotiation with developers having regard to site suitability and economics of provision.</p> <p>Part (B)</p> <p>The draft policy indicates that the normal expected level of provision will be 50% of habitable rooms. Again, we consider that this is contrary to government guidance in Circular 06 / 98. Paragraph 9(b) states that local authorities should indicate how many affordable homes</p>		<p>Part A</p> <p>Not accepted. The Council recognises that the threshold included in the proposed policy is at odds with Circular 6/98. However, the Council considers that given the circumstances of the supply of additional housing land in Lambeth, and the continued unmet need for affordable housing, the lower threshold is necessary. The Council acknowledges that it will be inappropriate to seek any affordable housing on some sites, and the policy allows less to be provided (possibly none) if the developer demonstrates that a given level is unviable.</p> <p>Part B</p> <p>Not accepted. The site size threshold and 50% habitable rooms target, whilst partially out of step with Circular 6/98, is justified in the local context of the outstanding need for affordable housing. Unless these targets are adopted, the Council will not meet its target for affordable housing which itself is an underestimate of actual need. The Council refers to expert evidence indicating that residential sites in Lambeth can support 50% affordable housing. A significant majority of housing will come from large identified sites where guidance indicates it is appropriate to refer to a % requirement for affordable housing.</p> <p>Part C</p> <p>Accepted - this paragraph has been removed.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
4.10.12	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4908	<p>need to be provided throughout the plan area and set indicative targets for specific sites. Local authorities should then indicate the intention to negotiate with developers for the inclusion of an element of affordable housing on such sites. The Circular makes no mention of setting percentage provision for the area as a whole as set out in the draft policy.</p> <p>Notwithstanding, we consider that a percentage target of 50% of habitable is onerous and may well have the effect of reducing landowners' and developers' incentive to either sell or develop land for residential use. Such an outcome would be counter productive to the Borough Council's housing objectives.</p> <p>Part (C) We object to the policy's reference to the concept of additionality whereby provision of affordable housing through the policy should be additional to housing provided through public subsidy. We consider that this part of the policy should be deleted.</p> <p>That affordable housing should be affordable in perpetuity - this provision is important, and should be moved into the body of the policy, not left in the supporting text.</p>		Not accepted - the Council thinks it is appropriate for this to be in the supporting text.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
4.10.13	Coin Street Community Builders	1589	6339	The Three Dragons report might have been deemed "excellent research" but it totally avoided real market place decisions when it explicitly avoided considering that developers might cease to build housing or prefer other forms of development or developments elsewhere. The likely impact of the sort of demands put on residential developers in this draft plan is to discourage housing development in Lambeth.		Not accepted - no change. Whilst the Council recognises that there are valid criticisms of the Three Dragons research, the approach is nevertheless appropriate and robust. In addition, in testing whether it was appropriate to include a requirement for 40/50% affordable housing in the Policy, the Council also commissioned a separate study to test the viability of this requirement in Lambeth. This study indicated that the requirement was sustainable in the Borough. Policy 16 itself is drafted in a flexible way such that where schemes are not viable with a given level of affordable housing, the requirement for affordable housing will be reduced.
4.10.16	Coin Street Community Builders	1589	6340	We object to the proposal to ringfence into a boroughwide fund. The whole purpose of requiring on-site provision is to create mixed communities. If it proves absolutely impossible to provide housing on-site, then clearly any S106 monies should be spent in the immediate neighbourhood.		Not accepted - no change. In the very limited circumstances where payments in lieu are accepted, it would be too onerous a requirement on the Local Authority to have to utilise the funds on an affordable housing scheme in the locality - although the Council will use its best endeavours to achieve this. Where it cannot achieve this, it is appropriate that those funds are incorporated into a Boroughwide fund to secure affordable housing elsewhere in the area.
4.10.18	Coin Street Community Builders	1589	6341	We object because we are completely unclear as to the meaning of this paragraph.		Not accepted - no change. The Council considers that the meaning of this paragraph is clear.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 18	Steve Wiltshire/ Hazel Fraser	1677	2516	<p>We support the general thrust of the policy but we are concerned at the vague and subjective terms used to control development e.g. over intense, oversteering, over concentration, unacceptably. These terms are not measurable and will lead to arbitrary and subjective decision making. We live in a street where there has been, and still is a high concentration of hostel accommodation. Three hostels remain and two have closed, on due to failing to conform to the old UDP and the other as a result of nuisance to other residents and poor management.</p> <p>It is clear that residents of hostels benefit from belonging to a stable community and that where there is an over-concentration of hostels, the community becomes destabilized and unbalanced. The old UDP had guidelines on the number of hostels allowed in a specific area, the new UDP has none.</p> <p>We live in a residential street adjoining a Town Centre and this policy provides no ground rules to control the number of hostels in our area.</p>	The UDP should set out measurable standards to control development of shared housing and supported housing. Number of hostels in a particular area should be capped e.g. 1 hostel every 150 yards as in the old UDP.	Agreed - change made
Policy 19	Clapham and Stockwell Town Centre Board	1770	3166	<p>This could be linked to urban design policy.</p>		Noted however cross-referencing between policies has been deliberately avoided within the UDP.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 20	Tesco Stores plc	1577	6408	<p>Policy 20, Section B indicates that in mixed-use developments, where an increase of commercial floorspace of greater than 200sq.m. is proposed then functionally independent residents accommodation with separate access should be provided equal to at least 50% of the increase in commercial floorspace.</p> <p>This Policy is overly prescriptive, and may actually discourage commercial expansion. 200sq.m. is an extremely low level of floorspace, and the introduction of additional residential in addition to an increase of commercial floorspace may not be economically viable, or suitable in certain developments.</p>	The policy should state that, where possible, a residential element should be included on mixed-use development sites.	Not accepted - the 200sq.m. threshold was considered and argued in detail at the Westminster UDP inquiry. The inspector found that it was appropriate given the predominantly small-scale nature of developments and commercial uses. The Lambeth situation is considered to be very similar. With the onerous new housing and affordable housing targets set for the borough by the government, the Council feels justified in retaining its 200sq.m. threshold.
Policy 20	Coin Street Community Builders	1589	6328	We object as we do not believe that the residential requirements should be relaxed. This area is particularly suitable for residential development as is demonstrated by the popularity of the White House, County Hall and other conversion schemes.	Delete.	Accepted - paragraph will be deleted. Principle of appropriateness of residential density in Waterloo area accepted, as has been the case in the developments noted.
Policy 21	Tesco Stores plc	1577	6394	<p>Policy 21, Section (x), states that large scale office developments should regenerate and benefit overall local communities, so that the inevitable disbenefits to the local community (in terms of traffic, congestions, crowds etc) are outweighed in planning terms by the benefits.</p> <p>Large scale office development does not have inevitable disbenefits to the local community, and successful schemes will enhance local communities, with no detrimental effects in terms of traffic congestion, adding to the vitality and viability of town centres.</p>	<p>Policy 21, Section (x) should read as follows:</p> <p>"Should regenerate and benefit overall local communities, and any disbenefits to the local community..."</p>	Accepted in part - Change made, the word 'inevitable' will be replaced with 'potential.'
Policy 21	Coin Street Community Builders	1589	6307	We object on the grounds that the definition of large scale offices (300sq m) is absurd. A high figure needs to be set or it will drive small and medium enterprises out of the area altogether.		Accepted – change made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 21	The Streatham Society	1873	4163	We consider that there is a need to maintain a reasonable level of office employment in central Streatham, both on direct employment grounds and also to increase the daytime population during the working week in order to sustain the viability of Streatham as a shopping centre.		Noted - however the 2001 GVA Grimley report identifies the Streatham location as very much a secondary office market with generally poorer quality stock than in the northern part of the Borough. The report concludes that even with improved public transport links, this area would only have the potential for a limited expansion of office stock. The UDP therefore does not adopt an office protection policy that is as strict as for other areas in the Borough, such as Brixton, Waterloo and Vauxhall.
Policy 21	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4915	We object to part B of this Policy, which weakens the protection of small office units above shops in Brixton Town Centre in cases where "these are longstanding vacant space above shops". Para. 4.12.19 states that demand from small businesses and the voluntary sector is such that "a strict policy of protection is necessary" for conversion from office to residential. But the policy as drafted does not provide strict protection. Property owners will simply forego rent on office space and claim they cannot rent spaces in order to gain exemption from this protection (e.g. as appears to be the case in Electric Avenue). If developers know they cannot convert small office space to residential under any circumstances, it is more likely they will ensure they are at least getting office rents.	Part B of policy should be amended to read: "Small office units are protected in Brixton town centre. The loss of office units etc"	Not accepted - it is considered that the policy affords a significant degree of protection for small office units above shops in Brixton. This level of protection is based on the findings of the GVA Grimley report on employment demand. It would not be sound planning or in accordance with the principles of sustainable development to leave longstanding vacant space above shops continually vacant if there appears to be no likelihood that it will be taken up for commercial use in the medium term.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
4.12.6	Coin Street Community Builders	1589	6335	We object to para 4.12.6 - this will effectively warn-off developers from providing family accommodation.		Not accepted - no change. The Council does not accept that paragraph 4.12.6 will discourage developers from providing family accommodation. The Council is seeking to regenerate office uses in the Waterloo area and the application of the Policy is unlikely to have a significant impact on the amount of family housing coming forward in the area. The Council is mindful of the underlying principle in the UDP that where land is not specifically protected, housing will be appropriate where a suitable residential environment can be achieved.
Policy 23	Lambeth Housing Association Liaison Group (LAMHAG) co Metropolitan Housing Trust Thames Region	1617	2288	We fully support the 'exceptions' approach outlined in iv). However, we believe the categories of use where the exception cannot apply are too wide Pubs and modern units, for example, should be available for 'exceptional' affordable housing. Secondly we object to the possible inclusion of an element of general market housing, unless it is made clear that the affordable housing element would be in excess of (i.e. more than 50%) the normal expected provision.		Not accepted - Public houses are a specific use which the Council is seeking to protect via Policy 27. It is therefore reasonable for the Council to exclude this land use from the affordable housing 'exception' clause. If, in the Council's view, an application is proposing the replacement of modern, well designed employment floorspace which would appear to have a very good prospect for re-use for employment purposes, it should be able to retain the right to refuse permission for affordable housing schemes in exceptional cases. The Council would also wish to retain a little flexibility in the policy exception to allow for circumstances where, on large sites, some market housing may be required to subsidise the improvements and increase in affordable housing on the site.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 23	The Camberwell Society	2029	4649	Concern that developments for solely affordable housing, rather than mixed can change the demographic nature of an area.		Not accepted – the policy should be read alongside Policy 16 seeking mixed and balanced communities which includes a suitable proportion of general market housing and this would prevent excessively large proposals solely of affordable housing.
4.12.23	Coin Street Community Builders	1589	6308	Is the Council working with the Central London Learning and Skills Council? If not, it should be.		Noted - however, this is not a matter for the UDP.
Policy 26	Coin Street Community Builders	1589	6346	Staff of major businesses, hospitals, colleges etc also need community facilities. Policy 26(D) implies that only residential developers need to consider such needs. Developers of other sorts may well be in a better position to fund or to contribute towards the provision of community facilities and Lambeth itself should have a proper budget and strategy for ensuring that the needs of its communities are fully met.		Not accepted. Section (G) of this policy requires community uses in the form of childcare facilities to be provided as part of large non-residential schemes.
Policy 26	Coin Street Community Builders	1589	6334	Object to 26(D) which requires housing developers to provide new community facilities (or financial contributions to improving existing facilities) where the development creates or exacerbates an existing shortage of community facilities. This requirement is too onerous and will result in less housing being developed.		Not accepted - no change. It is entirely appropriate to require planning benefits which would make otherwise unacceptable development, acceptable.
Policy 26	Friends of Hillside Gardens Park	1624	2299	This policy makes insufficient mention of sport [in (D) Deficiencies] and then only in relation to Waterloo. Access to good sporting facilities is a right and necessity if we are to build healthy and balanced communities in our cities. Provision of sport for citizens of all ages and abilities must be facilitated, protected and enhanced by the local authority.	A new clause should be added: Community facilities make a vital contribution to sports provision borough-wide. In new development or restructuring of community facilities consideration should be given, in consultation with local residents and groups, to improve and widen scope for sporting activity both indoor and outdoor.	Not accepted - Sports facilities are already covered in Policy 45.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 26	NHS Executive London Regional Office	1694	2594	We welcome the support in criteria (F) for the further development of major teaching hospitals and for the provision of Primary Care Facilities (paragraph 4.13.11). However, we object to the section of criteria (C) stating that losses of community facilities would need to be "unviable for redevelopment for community uses". This would have the effect of reducing the viability of re-developments of health care facilities within class D1 to help meet increasing standards of health care provision.	We suggest that the words "and/or unviable for re-development for community uses" be deleted from this policy, or that this aspect of the policy is clarified to indicate that it does not apply to the re-development of health care facilities where this is part of a wider strategy to improve health care provision.	Accepted. This sentence is proposed to be removed from the policy.
4.13.7	Paul Robson	1747	6361	Para 4.13.7 does not mention the severe shortage of secondary school places throughout the Borough. It suggests that the centre of the Borough is adequately served, which is not the case. It does not present a coherent plan to address the shortage of places. It does not state:- how many places the proposed school in Clapham will provide in relation to the shortfall; how many places might be provided at the three small reserved sites on the map; how other sites will be found.	Para 4.13.7 should contain a clear statement of how many 11 year olds in Lambeth transfer to secondary schools outside the borough; a target for additional secondary school places in Lambeth by 2017; a list of sites (with number of places) for additional capacity with proposed dates of opening; a clear statement of how land and finance will be found to reach the target number of places by 2017.	Lambeth now accepts the limitations of its schools planning and is now preparing a revised schools operational plan. Changes are proposed to the text to reflect this. The detail requested however is too high a level of detail for a development plan and are best set down separately in the schools organisational plan, with the development plan reflecting any land-use implications.
Table 8	Coin Street Community Builders	1589	6337	We object to Table 8 - the requirement for housing developers to contribute to additional school places will effectively warn off developers from providing family housing.		Not accepted - no change. It is entirely appropriate that the Council requires planning benefits which make otherwise unacceptable developments acceptable.
Policy 28	Waterloo Town Centre Board	1894	4313	Waterloo boast of very little prostitution. Clearly increases of visitor attractions increase the likelihood of a prostitution problem.	Insert after, "Smaller hotels can be also be located in or on the edge of district centres, EXCEPT WATERLOO'	Not accepted – This is a problem where there are large numbers of older and run down street properties, formally residential, in use as hotels. This is not the case in Waterloo. It would be unreasonable to prevent a small number of newly built small hotels in Waterloo that would be very unlikely to cause this problem. Particularly given the requirement in RPG3 to permit more hotels in Waterloo.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 30	Coin Street Community Builders	1589	6358	The Plan should support the modernisation of Young Vic's facilities.		Noted - The Plan does support the modernisation of the Young Vic, in MDO133.
Policy 30	Clapham and Stockwell Town Centre Board	1770	3175	There is demand for space for use by creative industries across the borough and acknowledge in the Clapham and Stockwell area with the space operated by Studio Voltaire in Clapham and the site currently used by Stockwell Studios in Stockwell. Both report the need for more affordable space		Noted - However it is not the UDP's function to match demand for affordable workspace with supply.
Policy 30	Tim Gaymer	1845	3798	(D) Creative Industries - The provision of additional accommodation is promoted, and existing accommodation is protected by Policy 23. At the Brixton area Forum - reference was made to the Clapham-Brixton-Camberwell-Peckham-Deptford Artistic corridor, with a view to encourage it as a cohesive link - this will require cross borough co-ordination and should have a specific reference in the Lambeth Plan.	This should be encouraged to create regeneration and allow more appropriate uses to the railway arches, away from car workshops.	Not accepted - Policy 30 does recognise the need for cultural uses and creative and cultural industries, however it does not consider it necessary to identify this particular corridor in the Plan or on the proposals Map.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 30	British Film Institute	2021	4598	<p>The South Bank area is designated MDO (Metropolitan Development Opportunity) 116. The redevelopment of the South Bank as Britain's premier arts and cultural centre is fully supported by Lambeth. There is an understanding that there is a requirement for 'enabling' development to help fund the scheme, with the provision that any 'enabling' development should have a proper business case (including projected figures for cost and long term revenue projections).</p> <p>The bfi has an aspiration to combine all the British Film Institute's public facilities on one site and to operate as a fully integrated facility, for the first time since the bfi's inception in 1933. The core elements of the bfi Film Centre will include: a new and enlarged bfi National Film Theatre providing audiences with access to an outstanding range of films from around the world; a bfi Education Complex offering a state of the art environment for learning about film and moving image at all levels, encompassing a Library, a Mediatheque and an Education Suite with fully equipped teaching spaces: the bfi Museum of the Moving Image and a Special Exhibition Gallery, drawing on the bfi's unique collections and using digital technologies to celebrate the past, present and future of the moving image. The dynamic new Film centre will provide a home for bfi, its Film Festivals and Special Events. It will enable the organisation to fulfil its mission of celebrating film and television culture, and promoting film education to audiences in Lambeth, the UK and across the world. We are looking to create no less than the focal point for film in the UK and Europe.</p> <p>The space required, at 19,000 sqm, is larger than our current restrictive site located under Waterloo Bridge, and it is our ambition to create a new world-class landmark facility designed by international architect David Chipperfield</p>		Accepted in part– change proposed. However is necessary to require that enabling development does secure future of arts/cultural use a slightly stricter form of wording is proposed.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 30	The Camberwell Society	2029	4652	<p>located elsewhere on the South Bank within an integrated and formally agreed Masterplan. In order to provide enabling funding it will be SBC and our intention to commercially develop the vacated space which currently houses the National Film Theatre and the Museum of the moving Image. Although we are sympathetic to the view that the overall character of the area as an 'arts space' should be protected we need to maximise the value of our long leasehold intrests in our site to help meet the significant capital costs of a propsoed new facility. This commercial enabling development will have a clear and lasting benefit to the relocated and vastly improved arts facility.</p> <p>The Artistic corridor, from Brixton through to Peckham should be encouraged See Camberwell Society Comments to Southwark Plan 2</p> <p>2. The strengthening of Camberwell town centre, building on the artistic base, the improvements already underway and developing the range and quality of shops, businesses and restaurants. The extent and focus of Camberwell town centre should be given proper consideration. (see also under 4). The Society calls for a coherent and detailed strategy that responds to the pressure from the Congestion Charging Zone, the decline of Butterfly Walk, likely developments by Sainsbury's on the Walworth Bus Garage site, the probability of the new Camberwell Station and the many new housing developments. The Society supports the production and implementation of a Streetscape Manual for Camberwell. Funding should be sought from organisations such as English Heritage and the Heritage Lottery Fund.</p>		<p>Not accepted - Policy 30 does recognise the need for cultural uses and creative and cultural industries, however it does not consider it necessary to identify this particular corridor in the Plan or on the proposals Map. The very small part of the Camberwell Town Centre that does fall within Lambeth has been identified as 'edge-of-centre' on the Proposals Map and will be protected as per Policies 4 and 5.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
4.15.8	Lambeth Police/Borough Crime Strategy Officer	2072	5000	I support 4.15.8		Support welcomed - however this paragraph has now been replaced with a new policy on Community Safety/Designing Out Crime (Policy 31a).
Table 10	Waterloo Town Centre Board	1894	4323	The buildings densities stated in Table 10 for Central Sites, which includes Waterloo, are too High for social housing. However, if private sector housing is in excess of this minimum I feel this is permissible.		Not accepted – the figures are based on LPAC research which showed that affordable housing was possible at these densities. A new report from the London Housing Federation also shows that high density affordable housing is possible in London.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 34	Outdoor Advertising Association	2223	5192	<p>The OAA are pleased to see that the London Borough of Lambeth acknowledges that outdoor advertising is an important activity and will be assessed on amenity and safety issues. However, the OAA would like to raise a number of objections with respect to Policy 34, and these are numbered 1 to 4 below.</p> <p>1) The first sentence of section (C) of Policy 34 concerning advertisement hoardings states:</p> <p>"whether on a building or freestanding will only be approved where they enhance the appearance of an area..."</p> <p>It is not the role of advertisement control, or policies within development plans, to refuse advertisements that have a neutral effect on the amenity of the area as is currently implied by this policy. Advertisements do not need to make a positive contribution in order to be acceptable in amenity terms.</p> <p>Paragraph 9 of PPG19 states:</p> <p>"...the display of outdoor advertisements can only be controlled in the interests of "amenity" and 'public safety'."</p> <p>This consideration of only 'amenity' and 'public safety' in the control of advertisements is again emphasised in Paragraph I of PPG19's Annex, which concerns criteria for deciding applications and appeals involving poster-sites. The London Borough of Lambeth should recognise that advertisement applications should be considered solely on amenity and public safety grounds, and should not consider 'enhancement' as a basic requirement.</p> <p>Further, paragraph 2 of PPG19's Annex states: "In applying the expression "in the interests of amenity" to any particular application or appeal,</p>	<p>1) Should state in B " Advertisement Hoarding applications will be approved where they do not detract from amenity or public safety.</p> <p>2) The second sentence of section (C) of Policy 34 states: "Advertisement Hoardings are not permitted ...on railway embankments ..."</p> <p>There is no basis for highlighting railway embankments as an area where Advertisement Hoardings are not permitted. Railway embankments are no less suitable for poster hoardings than any other location. It is suggested that the reference to railway embankments in the second sentence of section (C) of Policy 34 is deleted.</p> <p>3) The fourth sentence of section (C) of Policy 34 states: "Highly obtrusive adverts will be discontinued."</p> <p>Paragraph 29 of PPG 19 concerns the power to discount deemed consent advertisements and with regard to discountenance notices, states.</p> <p>"Like the LPA, the Secretary of State will consider whether the notice is necessary to remedy a "substantial injury to amenity ... "</p> <p>This highlights the statutory test that an advertisement must constitute "a substantial injury to amenity" to justify discontinuance action. This highlights the statutory test that advertisement that the fourth sentence of section .</p> <p>" Justify discontinuance action. It is</p>	<p>1) Accepted - change made.</p> <p>2) Not accepted - Railway embankments are highly obtrusive and unsuitable locations for hoardings.</p> <p>3) Accepted - change made.</p> <p>4) Not accepted - even though private they are visually part of the public realm and need to be treated in the same manner. They are also a hazard to the blind that cannot distinguish between private and public forecourts. There is no deemed consent as they are not on shop premises.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>account should be taken not only of factors which may be detrimental to amenity but also of factors which may be to the advantage of the amenity of a locality, such as adding appropriate colour and interest to a drab area, or screening an eyesore"</p> <p>PPG 19 recognises what poster-sites can do, and these advantages should not be overlooked. Section (C) of policy 34 might therefore be reworded as follows:</p> <p>(rest of text in paper copy)</p>	<p>suggested that the fourth sentence of section (c) of policy 34 is altered to follow this wording.</p> <p>4) The first sentence of section (E) of Policy 34 states:</p> <p>"Advertisements on footways (including private forecourts) will be severely restricted so as not to restrict pedestrian access and to prevent street clutter ."</p> <p>This states that advertisements on private forecourts will be treated as if they are "footway" advertisements. There is no reason why advertisements should not be permitted on private forecourts, indeed many have deemed consent under Class 6 in Schedule 3 of the Town and Country Planning (Control of Advertisements) Regulations 1992. The public footway is provided for the free flow of pedestrians. Private forecourts should not be considered as part of the public highway, and forecourt signs should not be refused solely because they are in an area of heavy pedestrian flow, in a conservation area, or within the vicinity of listed buildings, as is implied in section (E) of Policy 34. Each Proposal and location should be considered on its merits.</p> <p>It is suggested that the inclusion of private forecourts in section (E) of Policy 34 is deleted.</p> <p>It is hoped that these comments</p>	

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
					are found to be useful and informative. Should you require any further information or direction on these issues please do not hesitate to contact us.	
Policy 34	Nicholas Long	2248	5205	Lambeth council is not seeking any control over signage and/or advertisements they may interfere (or would interfere) with the angle of vision of the cameras in the main CCTV system. This also includes the sitting of street furniture, such as freestanding pavement advertising and Telephone Booths. This is a classic own goal.	Inclusion of policies to permit the refusal of consent on the grounds that a CCTV Camera angle of vision would be unduly or adversely restricted. Also policy in respect of sitting of pavement furniture for similar reasons.	Accepted - change made - see reference to amenity and public safety.
Policy 36	Lambeth Parks and Open Spaces Forum	1579	2521	<p>The current UDP polices (ENV7-10) protects all trees in Lambeth to some extent, and goes to some lengths to provide a hierarchy of protection. In the new Deposit there appears to be no policy protecting: (i) trees in general, (ii) retention of trees in new developments, (iii) protection of trees in construction sites, (iv) planting of new trees, (v) trees in landscapes. PROTECTION IS ONLY AFFORDED TO THOSE TREES DEEMED TO BE UNDER TREE PROTECTION ORDERS (TPOs).</p> <p>Moreover, there is no benchmark stipulating the determining criteria I.e.: less, more, exceptional landscape value, screening or separation of trees. Policies 36 (D) (ix)-(xii) clearly require further qualification.</p>	Reword to incorporate current UDP policies ENV7-10	<p>Point (ii) is not accepted as the plan clearly states under (C) (iii) 'retention of existing mature trees, shrubs and hedges, particularly where these form part of the character of an area;' An amendment is proposed to this clause strengthening it using the wording of the act.</p> <p>(iv) covers planting of new trees and again an amendment is proposed clarifying this.</p> <p>Points (i), (iii) and (v) are not accepted as Section (D) of the policy covers all trees and not just those on construction sites and again an amendment is proposed to clarify this. Para 4.15.30 stresses the environmental value of trees. Management of trees in parks etc. is not a land use planning issue, which can be covered in the development plan.</p>
Policy 36	Clapham and Stockwell Town Centre Board	1770	3180	Particularly welcomed but concerned whether (E) and (F) are enforceable -an appropriate mechanism would need to be devised and resourced.		Noted. These sections of the policy will be expanded to explain further.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 36	Waterloo Town Centre Board	1894	4351	(D) There are no policies to protect trees overall, not only TPO's.		Not accepted - Section (D) of the policy covers all trees and not just TPO's or those on construction sites and an amendment is proposed to clarify this. Para 4.15.30 stresses the environmental value of trees.
Policy 37	English Heritage	1655	2382	paragraph (A) High Buildings and Views Minor revision and additions:	(iii) after Lambeth Palace Complex add -"historic open spaces of Central London such as St James Park and Trafalgar Square". (iix) sic - should be (vii) (ix) add after London Squares - "the River Thames, its embankment and bridges".	Not accepted - the revised criteria-based policy is able to take such considerations into account. Renumbering has been accepted and change made.
Policy 37	Waterloo Town Centre Board	1894	4314	This policy is poorly thought out and there is concern that Waterloo will be a haven for tall buildings. I object because it is not clear.		Not accepted – the policy does not now specify geographical locations where high buildings will be appropriate, rather, it sets out the characteristics of locations where high buildings may be acceptable.
Policy 38	Coin Street Community Builders	1589	6348	We have indicated our intention of creating two new kiosks along the riverside walkway aimed at meeting needs with (1) illegal traders or (2) diesel-producing vans. These kiosks were originally proposed in the 1997 South Bank Landscape and Riverside Walkway Strategy. We would like confirmation that if designed and located in accordance with 38(e) these proposals will be acceptable.		Noted however this objection is too detailed for inclusion within the UDP and is best dealt with at the planning application stage. Nochange proposed.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 38	Coin Street Community Builders	1589	6350	We oppose use of the Riverside Walkway for cycling between Westminster Bridge and Blackfriars Bridge. The Lambeth Plan should also oppose such use and promote the use of the "spine use".		Not accepted. The Thames towpath is not a designated cycle way - that currently runs along parallel roads. The towpath is mainly in various private ownerships, but is used informally for cycling. The banning of cycles from using the riverside walkway goes beyond the scope of the UDP. The towpath is also a proposed Lambeth cycle route, and it is the long-term aspiration of the Council that the towpath becomes a designated cycle way.
Policy 38	Mr E Mirzanli	2251	5118	Not appropriate	Build affordable homes on the river to create mixed communities allow floating hotels, shops etc.	The policies of the plan, seen as a whole, promote and secure affordable riverside housing. Moorings are covered in Policy 40.
Policy 40	English Heritage	1655	2399	Support this policy with minor addition.	(A) include "archaeology of the foreshore and banks".	Accepted - change made.
Policy 41	Groveville Ltd	1771	3159	The key issues to sustaining listed buildings in the long term are to ensure they earn their keep. Investment will only go into listed buildings if sufficient returns are generated. The policy and reason justification need great weight to this consideration, particularly given that most listed are in private hands.		Not accepted - This policy already seeks to preserve listed building.
Policy 42	Shell International Petroleum Company Limited and Lend Lease Europe Ltd	1969	4502	We consider part (F) of Policy 42 is unduly prescriptive and exceeds the guidance contained within PPG15. Accordingly, we propose that it is deleted. Within Conservation Areas there is a statutory requirement for LPAs to pay special attention to the preservation or enhancement of the character or appearance of the area.		Not accepted - The Council does not consider that this policy is unduly restrictive or exceeds the guidance set out in PPG15.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 44	Waterloo Town Centre Board	1894	4319	I do not agree with the contents of this paragraph. There should be no de-designation of MOL.	Delete everything after 2nd line.	Accepted - A consultant's study (BDP) commissioned by the Council to assess the issues surrounding the potential planning conflict between the designation of the Hungerford Car Park site as both MOL and an MDO, in light of objections to the initial Deposit Draft UDP, has recently been completed. The report concludes that the designations are generally in conflict with each other and that is this instance, the only reason to entertain the dual designation would be for the benefit of the expansion of the South Bank Centre. The South Bank Centre's aspirations to develop the Hungerford car park site have to be balanced against the case to improve the existing adjacent open space and extend over this site. The Council has now more fully considered the relative merits of allowing SBC to expand on to this site versus extending Jubilee Gardens onto the Hungerford Car Park site and creating a world class public open space on the MOL land, and considers that the latter is the prudent way to proceed. In the light of the substantial development pressures and the priority given to open space protection and enhancement, the Council concludes that there is a stronger case for the car park to be used as open space than to extend the South Bank Centre over all or part of the Hungerford car park site. Following on from a recommendation in the consultants study, it is now proposed to put together a planning brief for the existing South Bank Centre site in order to maximise development

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 44	Lambeth Friends of the Earth	2050	4812	Opposition is given to the idea of allowing small scale development that will lead to loss of MOL. Issue here is that once a precedent is made, it will be difficult for the Borough to refuse similar applications in the future leading to further and unacceptable loss of MOL. The protection of these areas is essential and the proposed land uses appropriate.		options for their future aspirations. The MDO designation for the South Bank Centre on the Proposals Map will therefore be redrawn to exclude the Hungerford Car Park site. The site itself (including the service designation) signifying the Council's intention that the site should become part of a greater Jubilee Gardens public open space, or world class standard.
4.18.3	Lambeth Parks and Open Spaces Forum	1579	2932	The Deposit proposes the unusual step of de-designating part of the Hungerford car park currently ear-marked as an extension of Jubilee Gardens) to allow a service road for the Royal Festival Hall. The RFH can be serviced by a road currently running between the RFH and the railway viaduct, but the RFH have applied to put an office block on this services road. This de-designation is therefore unacceptable.	Retain the designation of the entire Hungerford Car Park (up to the railway viaduct) as MOL. Delete references to the Hungerford car parking Para 4.18.3	Not accepted: small scale ancillary development is as set out in national guidance PPG2 and is for circumstances when this is necessary for the protection of the space. This can be for maintenance huts, machinery storage etc. but obviously precludes detrimental development not essential for the maintenance of the MOL. This has been responded to under Policy 44.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Fentiman Rd Richborne Tce and Dorset Rd Res Assn	1528	6359	<p>Under Lambeth's current development plan regeneration of public open space and parks (other than those designated as MOL) is possible, including elements of redesign, relocation and remodelling, provided that replacement public open space of at least equivalent size and quality is provided. if public open space is lost to development.</p> <p>The current development plan policies have proved to provide an appropriate level of protection of public open space while allowing regeneration and development. Thus Lambeth Walk Open Space was protected by the policies from a recent development proposal, whilst the regeneration of Albert Embankment Gardens, including development of some of the public open space, was permitted.</p> <p>Policy 45(c) affords no such protection. It specifically allows schemes which result in a net loss of public open space. This is entirely inappropriate where there is already a deficiency in open space (or is likely to be) due to increased densities and general intensification of land use envisaged and encouraged elsewhere in the deposit plan.</p> <p>The policy is also ill-defined and would not prove robust in protecting public open space from many developments which it is surely not intended to encourage. For example "Limited loss"; "minimum to meet these objectives"; "community safety benefits"; "limited exception". The phrase "public support" Is particularly unhelpful given several notorious recent proposals to develop public open space championed by the local authority and approved of by officers in the face of widespread opposition.</p> <p>Nor does the policy specify what types of development would be acceptable or recommended for parks or public open spaces</p>	<p>The Plan designates Vauxhall Park as a "PARKS REGENERATION AREA". This is an inappropriate designation for a park which is a discrete space inside railings a historic park set up by Act of Parliament (The Vauxhall Park Act 1888) not in heed of regeneration required by local people to be subject to greater protection than that afforded by the proposed Policy 45 (C)</p> <p>Were Vauxhall Park to be re-designated under the plan to the Status of a Park or a historic Park and Garden (on English Heritage Register) then Friends of Vauxhall Park would feel no need to object to Policy 45 (C) as it would no longer affect Vauxhall Park</p>	<p>Accepted - the designation of Parks Regeneration Areas has been removed and the loss of park space would be unacceptable.</p> <p>Accepted in part - Vauxhall Park is designated as a park in the Plan and shown as such on the Proposals Map. The designation of Parks Regeneration Area has now been removed. It is not however on the English Heritage register and is unlikely to qualify.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Friends of Archbishops Park	1536	3390	<p>(b) The policy as framed allows for schemes which redevelop public open spaces to provide a discontinuous series of replacement public open spaces, provided that they amount to equivalent size as that lost to development.</p> <p>This does not acknowledge the importance of sizable and contiguous public open space. This loophole is not sufficiently covered by the word "quality".</p>	insert "and continuity" between "equivalent size" and "and improved quality".	Accepted - however rather than utilise the suggested changes the policy is to be rewritten. There will be no loss of open space other than in exceptional circumstances. This follows also the advice of draft PPG17 which requires the production of an open space strategy to better inform open space decisions. This will be carried out as part of the UDP review process.
Policy 45	John Peer	1559	2912	Jubilee Gardens and Hungerford Car Park are also shown on the map as a Parks Regeneration area Policy 45 (A) says development will not be permitted on such land except for maintenance or enhancement of the park However, section (C) of the policy allows the loss of open space, where an improvement to the park is achieved in conjunction with a development. This may be appropriate where ragged edges to a park are tidied up but it is wholly inappropriate to Jubilee Gardens and Hungerford Car Park. Similarly any net loss of open space is totally unacceptable		Accepted - parks regeneration areas are to be removed and therefore no such designation will affect Jubilee Gardens or Hungerford car park.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Anne and Mike Burke	1631	3221	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end, known as the podium site, which covers an underground car park. The Shell podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and the amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted - this site will be included as public open space in the revised UDP.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>the disputed policy/MDO/proposal map, might lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft :</p>		
				<p>POLICY 7 Protection of Residential Amenity</p>		
				<p>POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.</p>		
				<p>POLICY 38 River Thames, Protection, Use and Access</p>		
				<p>POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area, the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.</p>		
				<p>POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.</p>		
				<p>POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.</p>		
				<p>POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river', and a place with a flourishing, cohesive and inclusive residential community</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Ms Esther Wang & Mdm Chwee Keng Wong	1632	3218	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end: The Shell Podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. In the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of the disputed policy/MDO/proposal map, might lead to justification of development on the</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public -which it has been since the Shell Centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to Conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted - the site will be identified and designated as public open space in the revised draft deposit UDP.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				podium site, which would be contrary to other policies contained in the Draft:		
				POLICY 7 Protection of Residential Amenity		
				POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.		
				POLICY 38 River Thames, Protection, Use and Access		
				POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.		
				POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.		
				POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.		
				POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river' , and a place with a flourishing, cohesive and inclusive residential community.		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Dr MDO'Brien MDFRIP	1712	2663	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end: The Shell Podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. In the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of the disputed policy/MDO/proposal map, might lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft:</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public -which it has been since the Shell Centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to Conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space</p>	<p>Accepted - the site will be identified and designated as public open space in the revised draft deposit UDP</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

POLICY 7 Protection of Residential Amenity
 POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.
 POLICY 38 River Thames, Protection, Use and Access
 POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.
 POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.
 POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorized as public open space, regardless of ownership, and as such protected from development and erosion.
 POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river' , and a place with a flourishing, cohesive and inclusive residential community.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Peter Harris	1713	2666	Jubilee Gardens and Hungerford Car Park are also shown on the map as a Parks Regeneration area Policy 45 (A) says development will not be permitted on such land except for maintenance or enhancement of the park However, section (C) of the policy allows the loss of open space, where an improvement to the park is achieved in conjunction with a development This may be appropriate where ragged edges to a park are tidied up but it is wholly inappropriate to Jubilee Gardens and Hungerford Car Park. Similarly any net loss of open space is totally unacceptable		Accepted - parks regeneration areas are to be removed and therefore no such designation will affect Jubilee Gardens or Hungerford car park.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Peter Cariss	1728	2748	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end: The Shell Podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. In the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of the disputed policy/MDO/proposal map, might lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft:</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public -which it has been since the Shell Centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to Conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted - the site will be identified and designated as public open space in the revised draft deposit UDP</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

POLICY 7 Protection of Residential Amenity
POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.
POLICY 38 River Thames, Protection, Use and Access
POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.
POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.
POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorized as public open space, regardless of ownership, and as such protected from development and erosion.
POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river' , and a place with a flourishing, cohesive and inclusive residential community.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Doris Newnham	1729	2754	Jubilee Gardens and Hungerford Car Park are also shown on the map as a Parks Regeneration area Policy 45 (A) says development will not be permitted on such land except for maintenance or enhancement of the park However, section (C) of the policy allows the loss of open space, where an improvement to the park is achieved in conjunction with a development This may be appropriate where ragged edges to a park are tidied up but it is wholly inappropriate to Jubilee Gardens and Hungerford Car Park. Similarly any net loss of open space is totally unacceptable		Accepted - parks regeneration areas are to be removed and therefore no such designation will affect Jubilee Gardens or Hungerford car park.
Policy 45	J & C Finamore	1740	2807	Jubilee Gardens and Hungerford Car Park are also shown on the map as a Parks Regeneration area Policy 45 (A) says development will not be permitted on such land except for maintenance or enhancement of the park However, section (C) of the policy allows the loss of open space, where an improvement to the park is achieved in conjunction with a development. This may be appropriate where ragged edges to a park are tidied up but it is wholly inappropriate to Jubilee Gardens and Hungerford Car Park. Similarly any net loss of open space is totally unacceptable		Accepted - parks regeneration areas are to be removed and therefore no such designation will affect Jubilee Gardens or Hungerford car park.
Policy 45	Ray Puckey	1762	3023	(C) I do not agree with any loss of open space.	Delete policy 45 (C)	Accepted - parks regeneration areas will be removed in the revised deposit draft UDP.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Ray Puckey	1762	3025	Section G- Housing Amenity Areas. I do not agree with any loss of open space. In addition, where the Mayor's Spatial Strategy suggests increases in Lambeth housing dwellings by 27K, the demand for developments on open space will be immense.	Replace where significant areas are proposed for loss with, " and there should be no net loss of open space."	Not accepted - there are and have been numerous schemes in the pipeline for housing regeneration which is obliged not only to increase housing density to achieve Mayoral housing requirements but also, as part of the regeneration programmes, sets out to improve open spaces and reduce crime, improve urban design etc. Many of the poorly designed 1950's - 1970's housing estates fall into this category, where the open space is often a hostile and crime ridden zone. New schemes will tackle these problems, but in order to do this a reformatting of estates and sometimes a loss in the gross level of open space will be the result. However it is accepted on balance that as long as this loss is minimal and is offset by the gains then this is acceptable. To date, there are schemes where the Council has invested millions in research and design and it would be improper to jeopardise this by a blanket policy on housing amenity land.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Munro House Tenants and Residents Association	1763	3036	Section G- Housing Amenity Areas. I do not agree with any loss of open space. In addition, where the Mayor's Spatial Strategy suggests increases in Lambeth housing dwellings by 27K, the demand for developments on open space will be immense.	Replace where significant areas are proposed for loss with, " and there should be no net loss of open space."	Not accepted - there are and have been numerous schemes in the pipeline for housing regeneration which is obliged not only to increase housing density to achieve Mayoral housing requirements but also, as part of the regeneration programmes, sets out to improve open spaces and reduce crime, improve urban design etc. Many of the poorly designed 1950's - 1970's housing estates fall into this category, where the open space is often a hostile and crime ridden zone. New schemes will tackle these problems, but in order to do this a reformatting of estates and sometimes a loss in the gross level of open space will be the result. However it is accepted on balance that as long as this loss is minimal and is offset by the gains then this is acceptable. To date, there are schemes where the Council has invested millions in research and design and it would be improper to jeopardise this by a blanket policy on housing amenity land.
Policy 45	Munro House Tenants and Residents Association	1763	3034	(C) I do not agree with any loss of open space.	Delete policy 45 (C)	Accepted - parks regeneration areas will be removed for the revised draft deposit UDP.
Policy 45	Jez Feeney	1768	3121	(C) I do not agree with any loss of open space.	Delete policy 45 (c)	Accepted - parks regeneration areas will be removed for the revised draft deposit UDP.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Jez Feeney	1768	3123	Section G- Housing Amenity Areas. I do not agree with any loss of open space. In addition, where the Mayor's Spatial Strategy suggests increases in Lambeth housing dwellings by 27K, the demand for developments on open space will be immense.	Replace where significant areas are proposed for loss with, " and there should be no net loss of open space."	Not accepted - there are and have been numerous schemes in the pipeline for housing regeneration which is obliged not only to increase housing density to achieve Mayoral housing requirements but also, as part of the regeneration programmes, sets out to improve open spaces and reduce crime, improve urban design etc. Many of the poorly designed 1950's - 1970's housing estates fall into this category, where the open space is often a hostile and crime ridden zone. New schemes will tackle these problems, but in order to do this a reformatting of estates and sometimes a loss in the gross level of open space will be the result. However it is accepted on balance that as long as this loss is minimal and is offset by the gains then this is acceptable. To date, there are schemes where the Council has invested millions in research and design and it would be improper to jeopardise this by a blanket policy on housing amenity land.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Nicola Howey	1769	3135	Section G - Housing Amenity Areas. I do not agree with any loss of open space. In addition, where the Mayor's Spatial Strategy suggests increases in Lambeth housing dwellings by 27K, the demand for developments on open space will be immense.	Replace where significant areas are proposed for loss with, " and there should be no net loss of open space."	Not accepted - there are and have been numerous schemes in the pipeline for housing regeneration which is obliged not only to increase housing density to achieve Mayoral housing requirements but also, as part of the regeneration programmes, sets out to improve open spaces and reduce crime, improve urban design etc. Many of the poorly designed 1950's - 1970's housing estates fall into this category, where the open space is often a hostile and crime ridden zone. New schemes will tackle these problems, but in order to do this a reformatting of estates and sometimes a loss in the gross level of open space will be the result. However it is accepted on balance that as long as this loss is minimal and is offset by the gains then this is acceptable. To date, there are schemes where the Council has invested millions in research and design and it would be improper to jeopardise this by a blanket policy on housing amenity land.
Policy 45	Nicola Howey	1769	3133	(C) I do not agree with any loss of open space.	Delete policy 45 (c)	Accepted - parks regeneration areas will be removed for the revised draft deposit UDP.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Waterloo Town Centre Board	1894	4316	(C) I do not agree with any loss of open space.	Delete policy 45 (c)	<p>Accepted in part – the designation of Parks Regeneration Areas has been removed and the loss of park space would be unacceptable.</p> <p>Housing Amenity Land is Open Space as set out in PPG17 of July 2002. However there are some pressing housing issues in Lambeth not solely concerned with the singular loss of amenity land. Estate regeneration programmes, some developed from long before 2002, are advanced and urgent, as well as upgrades to other Council housing. This does not consistently lead to loss of Housing Amenity Land, however flexibility is necessary to deal with this type of open space. To this end the 'selective' development of housing amenity areas has been included in the policy, as the loss of amenity land has been factored in to some estate regeneration programmes for some time and it is not unreasonable that there will be further marginal losses in future estate improvements. The upside of this is greatly improved housing standards and improvements to the open spaces themselves – currently many are of poor quality and poorly designed, leading to considerable crime problems on some estates. The advice from the police is that this needs to be designed to more clearly fulfil a function, as either communal spaces, private gardens or for development, many are just left over pieces of ground and residents have often lobbied for space to be re-designated in one of these ways. A policy of no loss of amenity areas would make</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Waterloo Town Centre Board	1894	4352	There should be a policy to open up the White House Open Space, and that the fence be removed.		impossible the conversion of housing amenity space to higher level public open space, such as the local park proposed at Clapham Park Estate, and would jeopardize this project and other like it. Not accepted as it is already shown as 'other public open space' on the Proposals Map. Hence there is no need. The planning permission secures public access, the fence is temporary for health and safety reasons as people visiting the area have blocked the fountain with rubbish and this has flooded the basement car park. The fence will be removed when the problem has been solved.
Policy 45	Waterloo Town Centre Board	1894	4318	Section G- Housing Amenity Areas. I do not agree with any loss of open space. In addition, where the Mayor's Spatial Strategy suggests increases in Lambeth housing dwellings by 27K, the demand for developments on open space will be immense.	Replace where significant areas are proposed for loss with, " and there should be no net loss of open space."	Not accepted - there are and have been numerous schemes in the pipeline for housing regeneration which is obliged not only to increase housing density to achieve Mayoral housing requirements but also, as part of the regeneration programmes, sets out to improve open spaces and reduce crime, improve urban design etc. Many of the poorly designed 1950's - 1970's housing estates fall into this category, where the open space is often a hostile and crime ridden zone. New schemes will tackle these problems, but in order to do this a reformatting of estates and sometimes a loss in the gross level of open space will be the result. However it is accepted on balance that as long as this loss is minimal and is offset by the gains then this is acceptable. To date, there are schemes where the Council has invested millions in research and design and it would be improper to jeopardise this by a blanket policy on housing amenity land.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 45	Robert Allison	2116	5298	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end, known as the podium site, which covers an underground car park. The Shell podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and the amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted in part – The Shell podium site is now considered by the Council to be public open space and MDO 115 has been amended to reflect this. Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>the disputed policy/MDO/proposal map, might lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft :</p>		
				<p>POLICY 7 Protection of Residential Amenity</p>		
				<p>POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.</p>		
				<p>POLICY 38 River Thames, Protection, Use and Access</p>		
				<p>POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area, the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.</p>		
				<p>POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.</p>		
				<p>POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.</p>		
				<p>POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river', and a place with a flourishing, cohesive and inclusive residential community</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Map 2	Clapham and Stockwell Town Centre Board	1770	3185	Does not include Agnes Riley Gardens on Poynders Road does not appear on the map.		Not all of the smaller local parks/squares have been highlighted on the proposals map as the scale used makes it difficult to include every land designation on every site. However the policy (45) is to be rewritten and in its new form will, subject to exceptional circumstances, protect all open spaces irrespective of the proposals map coverage. In addition, the Council intends in the foreseeable future to carry out an Open Space strategy to identify all of its open spaces, which would be the first map reference for open spaces in the borough.
5.1.2	Prospect	2226	5084	We object to the wording of this paragraph in that it should clarify that sites not falling within a defined MDO are not precluded from redevelopment.	This list does not preclude possible development of unlisted sites.	Agreed - change made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
5.3.18	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4973	<p>Missing Policy -Public consultation on MDOs</p> <p>Object- The MDOs contained in the UDP include a number that will have a major impact on the communities in which they are located. It has not been possible for this submission on the UDP to cover all the MDOs in Brixton. This is due to the short timescale and the vagaries of who knows about and is willing/able to attend public meetings.</p> <p>The UDP should contain a policy making clear that, once the UDP is adopted, Lambeth will consult widely with local people, the Brixton Area Forum and other stakeholders on how developments arising from the MDOs will be taken forward.</p>		<p>Not accepted - no change. The identification of Mdos is intended to give potential developers an indication of the way the Council wishes to see sites developed. Whilst the UDP does not specify a use or uses for sites (in fact this is specifically avoided) it does often include urban design guidance. Where possible, the Council will prepare more detailed guidance in the form of development briefs/frameworks for MDO's. This will be after the UDP has been finalised. Such briefs and frameworks will themselves be the subject of comprehensive public consultation, particularly with the local community. In all cases, the development of any MDO will require planning permission and any application will be subject to the normal public consultation associated with a planning application. In summary, the local community and their representatives will have ample opportunity to influence decisions on the development of MDO's after the UDP has been adopted. In conclusion, the Council does not consider that it is necessary to include a new policy setting out consultation arrangements with local people in relation to the development of MDOs.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
5.3.18	Strategic Partners UK Fund 1 Ltd	2238	5163	<p>As identified on the Proposals Map within the Deposit Replacement UDP, the site forms part of the Major Town Centre area of Brixton. Given the site's location within the heart of Brixton town centre, we have no objection to our site falling within this designation. However, for the reasons outlined below, we consider that the site represents a significant development opportunity within Brixton town centre and, as such, should be subject to a site-specific designation and be identified as a Major Development Opportunity (MDO) on the Proposals Map.</p> <p>The land currently within our client's freehold comprises of a mixture of buildings of varying architectural styles, quality, heights and scale. Toplin House is a building of some architectural and historic merit and forms the majority of the site. The building extends to four stories and is characterised by a cupola at the junction of Stockwell Avenue and Femdale Road. A finely detailed elevation is presented to Femdale Road. The primary use of the building is currently as offices with the exception of part of the ground and first floor which is currently occupied as a branch Post Office.</p> <p>To the rear of Toplin House are located a mixture of commercial buildings varying from 1-2 stories in height. These are generally of poor architectural quality and do not respect the character of Toplin House or enhance the appearance of Brixton Conservation Area. Many of the commercial buildings back onto the rear gardens of the residential terraced properties along Bellefields Road.</p> <p>Our client wishes to promote the redevelopment of land currently occupied by the commercial buildings to the west of Toplin House for a mixed use scheme. At present, parts of the site</p>	<p>In light of the above, we respectfully request that our client's site, as identified on the attached plan CB Hillier Parker 1, is designated as a Major Development Opportunity (MDO) on the Proposals Map. Within Chapter 5 on Area and Site Policies (Part B) we request that the following is added:</p> <p>"MDO: Land and Buildings at Femdale Road Stockwell Avenue Redevelopment of land to the rear of Toplin House will be promoted, particularly for residential uses. New development should enhance the character and appearance of the Conservation Area and respect the style and character of Toplin House. "</p>	<p>Not accepted - it is not necessary to identify all sites appropriate for redevelopment in the borough. Only those considered a priority and/or those sites for which the Council have become aware that redevelopment proposals are coming forward (and could be delivered within the plan period), are given an MDO designation. Any redevelopment of this site would be controlled by the land use policies set out in the UDP for this town centre site and as such identifying the site as an MDO is not necessary.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

are under-utilised and there is an inefficient use of land. A comprehensive approach to this site will allow for the re-planning of uses and the provision of higher quality buildings to complement Toplin House and enhance the character of the Conservation Area. It would allow for the removal of inappropriate and unattractive commercial uses adjacent to the residential properties along Bellefields Road and their replacement with more sensitive uses, improving the amenity for the residents of Bellefields Road. Redevelopment of this land would result in an overall uplift in the quality of the environment, particularly as it would complement the proposals identified within the replacement UDP at Bon Marche Yard (MDO7).

Land to the rear of Toplin House would represent previously developed land under PPG3 "Housing" (March 2000). In addition to its location within a town centre it would be the preferred location for development as outlined in national planning policy guidance. Its proximity to over ground/underground public transport interchanges means that the site is located in a highly accessible and sustainable location. PPG13 "Transport" (March 2001) seeks to focus new development in such locations particularly sites within close proximity to transport hubs. The promotion of this site as a Major Development Opportunity would therefore be completely in accordance with national planning policy guidance and the broad strategic objectives of the UDP.

Our client's freehold is not insignificant. Given its location we consider that the site could make a valuable and significant contribution to the regeneration of Brixton town centre -a primary objective of the replacement UDP .
Changes Sought to the Plan

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 55	Streatham Partnership Board	1872	5376	<p>For Streatham, as for the Brixton Town Centre policy 55, consideration needs to be given to removing the barrier along the High Road, to making the area better for pedestrians and improving traffic flow.</p> <p>Proposals for 24 hour bus lanes would be opposed as many businesses would fold if unable to take deliveries (on 20 minute parking) and also customers.</p> <p>The Board would welcome a tram link and encourage it to come at least as far south as Streatham Station.</p>		Not accepted - the matters raised cannot be addressed through the regulation of development under the UDP.
Policy 55	Sarah Slater	2233	5088	The closure of Effra Road does not relieve pedestrian or vehicle congestion in Central Brixton.	A one way system along Coldharbour Lane and Allondie Road Pedestrian area in the market area at all times Extra lighting in Electric Avenue 24hrs.	Not accepted - the closure of Effra Road has been tested and proved viable on Brixton Car free day and will considerably improve pedestrian conditions and lead to an enlargement of open space. Details on the lighting etc are too specific for the policy to go into.
Policy 56	Sarah Slater	2233	5089	The closure of Effra Road does not relieve pedestrian or vehicle congestion in Central Brixton		Not accepted - the closure of Effra Road has been tested and proved viable on Brixton Car free day and will considerably improve pedestrian conditions and lead to an enlargement of open space.
Policy 56	Nicholas Long	2248	5206	The proposal to incorporate 'Brixton Oval - current name Tate Library Garden - into the Brixton Central Square to be unachievable. The Garden was a gift to the borough by Sir Henry Tates Widow and given in his memory. The gift was conditional, conditions which Lambeth Council have ignored but were forcibly reminded of at the time of the last scheme (1996-97).	Unless and until Lambeth obtains the necessary consent to permit a release from the conditions of the gift then Tate Library Garden should be committed from the proposals at Policy 56. I do not object to consideration/implementation of proposals after the council's release from its obligations.	Accepted. Change made.
MDO10	Ricky Renalls	1828	5130	Contrary to policy 1, 26, 25, 30. We need more sport facilities not less.	Remove this MDO. Protect as permanent sport facility.	Accepted - the MDO is proposed to be deleted.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO11	Ricky Renalls	1828	5127	The word 'surplus' needs to be defined. Contradicts policy 1, 9, 12	Remove this MDO. Use site for affordable homes.	There is a pressing need for housing in the area, and any redevelopment proposal would need to comply with Policy 16 in relation to affordable housing provision.
MDO12	Ricky Renalls	1828	5129	Contrary to the spirit of policy 1.	Remove.	Not accepted - It is unclear how the MDO conflicts with Policy 1. A new sentence seeking to reduce car parking provision is proposed to be added to make it more in line with Policy 1.
MDO13	Ricky Renalls	1828	5121	This policy encourages the council to sell assets	Remove or add: Building to be used for employment uses (policy 25).	Not accepted - the MDO designation does not encourage the Council to sell its assets. It also does not specify a use for the site.
MDO26	Pauline Anderson	1802	3313	The proposal to develop the Dexter Adventure Playground which is providing a service to the community children and young people foremost is contrary to the Council's recreation and Leisure policy (U.D.P.) RL4. This also conflicts with the draft proposals 26 which looks to develop and improve community facilities, and 45 which looks to protect and enhance open space and sports facilities.		Accepted. MDO has been deleted.
MDO26	Ricky Renalls	1828	5126	Keep as community facility/health centre/training etc. Contradicts policy 1, 25, 26	Remove MDO status.	Accepted - the MDO has been deleted.
MDO26	Ricky Renalls	1828	5115	The Lambeth planning officer does not seem to be aware of the precise way in which the facility was created and the tremendous contribution it had made to the local community. I object to MDO26 because it contradicts some of the policies in the deposit draft and the core strategic objectives also the planning green paper and the urban white paper 'our towns and cities'.		Accepted - the MDO has been deleted.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO27	Ricky Renalls	1828	5131	<p>This is opposed as the proposal is completely inappropriate due to the loss of training places.</p> <p>MDO 27 Contracts the following:</p> <ol style="list-style-type: none"> 1. the information detailed in the "background and context section of the "UDP Deposit -it will have an adverse affect on the ability of the borough to deal with many of these challenges. 2. The Mayor's Spatial Development Strategy. Given that the Mayor's London Plan is yet to be published, the wisdom of Lambeth prematurely publishing its plan, is highly questionable. 3. Recommendations in the DTLR Planning Policy Guidance 4. ' A better Quality of life' DETR, 1999 5. Planning Policy Guidance notes. 6. The Government Good Practice Guide GPG22 'planning for sustainable development - Towards best Practice'. 7. PPG12 8. The Urban White paper 'Our Towns and Cities' <p>Further more MDO27 makes no reference to the educational significance of the site - it is the only training facility in Lambeth with a spray booth - give the community access to it. MDO27 does not tally with policy 25, 21 or policy 1.</p>		The MDO designation is not intended to recognise all aspects of current uses, nor does it seek to protect such uses.
MDO30	Ricky Renalls	1828	5125	<p>We need to return this to an adult college. Twenty years ago Norwood College was closed and demolished and replaced by closing the school and opening the college. We need the college.</p>	<p>Remove MDO status. Keep the college.</p>	<p>THE MDO designation mentions a new college so this representation is not compromised.</p>
MDO37	Ricky Renalls	1828	5132	<p>Dispute that it detracts from the area. Must be kept for employment opportunities (policy 25). Keep the name.</p>	<p>Remove policy MDO37</p>	<p>Not accepted - The MDO designation does not specify a preferred use for this site and any proposal would be subject to the general land-use policies in the UDP.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 60	Julia Wright	1878	4230	Our heritage is important. As many buildings of historical interest should be preserved. Kennington should not be used as a through route. Carved in half by a traffic scheme that may not work any way.	I have only heard recently of UDP, and have not had time to read and digest it the 200 page document. Policy numbers and paragraphs are therefore missing. But I have attended residents meetings and have a right to be heard.	Accepted - changes made.
Policy 60	Julia Wright	1878	4229	Our heritage is important. As many buildings of historical interest should be preserved. Kennington is an architecturally interesting area close to Westminster the Thames etc. It should be preserved not exploited.	Green spaces retained, and indeed added to. Sensitive development.	Agreed. Changes made.
Policy 60	Steed	2216	6366	The Kennington Community is in need of community space such as a leisure centre not another supermarket as the area is now well served by Tesco's locally, Saisbury's and Safeway close by (Nine Elms and Walworth).I	The old bingo hall once provided some semblance of community service. It would be well replaced by a community centre leisure centre which would provide a resource to improved the health and well being of local residents.	Accepted. The Supermarket proposal has been deleted to reflect the demise of Project Vauxhall.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO43	Susan Jacobsen	2133	2216	I have two specific objections to make to the section on Loughborough Junction : 5.8	<p>A) I propose that the first sentence in 5.81. "The area round Loughborough Junction is one of the most neglected corners of Brixton." should be changed to read "The area round Loughborough Junction is one of the most neglected and deprived corners of Brixton."</p> <p>B) For the very same reason mentioned above I also propose that the section on Loughborough Junction should be classified as a Policy to be followed by specific MDO .The deposit does not make clear what criteria are applied when for example Herne Hill District Centre is treated as a matter of policy (Policy 59) and not Loughborough Junction. If Loughborough Junction is one of the most neglected areas in Lambeth it should therefore be given the prominence and priority it deserves.</p> <p>2) Loughborough Junction: MDO 43 5.8.2</p> <p>I propose that a specific reference to the problem of railway arches in the Loughborough Junction should be made here. The area has a high number of railway arches all of which are in industrial use with disastrous effects on the environment. You specifically refer to the problem in other areas (as in MDO7). There is no apparent reason why the problem is not highlighted here. I propose adding</p>	<p>A) Accepted - change made</p> <p>B) Not accepted - Policies and MDOs are of equal weight.</p> <p>2) Accepted - new Policy 23a to be inserted regarding the use of railway arches.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
-------------------	--------------------	------------------------------	----------------------------------	----------------------------	-----------------------------------------	----------------------------

the phrase: "Promoting creative use of railway arches and ending industrial uses."

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO43	Magdi Abdelhadi	2218	6368	<p>It is with a great sense of disappointment and anger that after more than eighteen months of discussions at the Brixton Forum not a single concrete proposal regarding the Loughborough Junction area, which your deposit admits is one of the most neglected areas of Brixton, could be found anywhere in your current plan. The question is WHY? Are we going to wait until after 2017 before we can even see a plan to change the appalling conditions in Loughborough Junction. I demand that such specific plans (if you have any) be spelt out as you do elsewhere in the deposit with respect to other areas. If you do not have any specific plans for Loughborough Junction, I demand an explanation. I have 2 specific objections to make to the section on Loughborough Junction:</p>	<p>1) I propose that the first sentence in 5.81 "The area round Loughborough Junction is one of the most neglected corners of Brixton" should be changed to read "The area round Loughborough Junction is one of the most neglected and deprived corners of Brixton."</p> <p>2) For the very same reason mentioned above I also propose that the section on Loughborough Junction should be classified as a Policy to be followed by a specific MDO. The deposit does not make clear what criteria are applied when for example Herne Hill District Centre is treated as a matter of policy (Policy 59) and not Loughborough Junction. If Loughborough Junction is one of the most neglected areas in Lambeth it should therefore be given the prominence and priority it deserves.</p> <p>I propose that a specific reference to the problem of railway arches in the Loughborough Junction should be made here. The area has a high number of railway arches all of which are in industrial use with disastrous effects on the environment. You specifically refer to the problem in other areas (as in MDO7). There is no apparent reason why the problem is not highlighted here. I propose adding the phrase "Promoting creative use of railway arches and ending industrial uses."</p>	<p>1) Accepted - change made.</p> <p>2) Policies and MDO's are of equal weight and are only included as policies in Part B where they are not confined to a specific geographical area, which can be shown on the Proposals Map.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO48	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4933	MDO 48(Myatts Field North) should be retained for community use.		The regeneration of MDO48 will be taken forward with a community-led masterplanning exercise. The future of existing community uses (which form only a small part of the MDO) will be considered as part of that masterplanning exercise. It is and it is unlikely that local people would support the loss of such uses without their replacement with equal or better facilities.
MDO48	Miss A Campbell	2236	5093	One of the main themes of the new UDP is the attempt to liberate for private development by falsely claiming that they are not safe. The fact that there may be foundations under the grass is of no relevance. We need more sports facilities - not less. If there are safety issues there are ways to resolve these other than to build on the open spaces, parks and sports pitches.	Remove MDO48. Any housing development should not touch the open space and there should be no loss of council owned homes.	Accepted in part - the wording of this MDO is proposed to be substantially amended
MDO48	Mrs S P Weller	2237	5094	I feel that the council should keep all the park, open space and sports facilities are create more community facilities for the current residents. This MDO48 proposal is contrary to many of the sensible policies in the existing UDP and also contrary to most of the policies in the new draft. This proposal would clearly be to the detriment of the vast majority of current residents. Furthermore the majority of the adjacent estate has already been refurbished (recently).	Delete MDO48. Any new development of Crowley Estate and Myatts Fields Estate should be done without losing any of Mostyn Gardens.	The regeneration of MDO48 will be taken forward with a community-led masterplanning exercise. The future of existing community uses (which form only a small part of the MDO) will be considered as part of that masterplanning exercise. It is and it is unlikely that local people would support the loss of such uses without their replacement with equal or better facilities.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO48	A Freeman	2252	5110	Sports facilities should be kept and enhanced. It is safe. The fact there are foundations is irrelevant. It is not true to claim that replacement facilities have been provided at Myatts Fields there are no additional replacement facilities at Myatts Field. We do not need tall trees planted on the football pitch.	Delete MDO48. Any development of Cowley Estate/Myatts Fields North should be done with the whole of the estate kept and improved. Lambeth needs more playing facilities and open space not less.	The regeneration of MDO48 will be taken forward with a community-led masterplanning exercise. The future of existing community uses (which form only a small part of the MDO) will be considered as part of that masterplanning exercise. It is and it is unlikely that local people would support the loss of such uses without their replacement with equal or better facilities. The Myatts Field Pitch has gone ahead anyway in advance of the Myatts Field North proposal. They are not directly related, however it will act to some degree in compensation.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
5.10.3	Friends of West Norwood Cemetery	1735	2780	Whilst we welcome the commitment of Lambeth Council to consult and will work with us on a programme for rectification and sensitive restoration of the Cemetery, we are concerned that this paragraph makes no mention of the scheme of management committee and its role in overseeing operations in the Cemetery. We suggest that this paragraph is replaced by that given below.	The south Metropolitan Cemetery (now known as West Norwood cemetery) dates from 1837 and is the finest necropolis in South London and also one of the most important cemeteries in England. However Lambeth Council unlawfully implemented a 'lawn conversion' policy, which led to the destruction of at least half the number of grave markers and memorials that existed in 1966 and illegally allowed reburial in over 1,000 graves. The scheme of Management Committee (to which Lambeth appoint. representatives) is now working with the Friends of West Norwood Cemetery on proposals for rectification and the sensitive conservation of the cemetery. The Scheme of Management Committee will ensure that the buildings 19th century character is maintained and that the cemetery is managed in line with the Ecology & Landscape Strategy to be agreed under the Scheme of Management and the Council will adopt a Land Management Plan that accords with the strategy.	Accepted - change made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
5.10.3	Nicholas Long	2248	5208	The statement is factually incorrect and should be replaced with an amended statement, as below. While the Friends of West Norwood Cemetery are an important partner and consultee, the key partnership is with the scheme of management committee (which I chair). The final statement is completely incorrect as it is the duty of the committee to ensure Lambeth Council manages the cemetery in accordance with agreed policies/strategies.	The south Metropolitan Cemetery (now known as West Norwood cemetery) dates from 1837 and is the finest necropolis ;in South London and also one of the most important cemeteries in England. However Lambeth Council unlawfully implemented a ' lawn conversion' policy, which led to the destruction of at least half the number of grave markers andm8morials that existed in 1966 and illegally allowed reburial in over 1,000 graves. The scheme of Management Committee (to which Lambeth appoint. representatives) is now working with the Friends of West Norwood Cemetery on proposals for rectificat1on and the senitive conservation of the cemetery. The Scheme of Management Committee will ensure that the buildings 19th century character is maintained and that the cemetery is managed in line with. the Ecology & Landscape Strategy to be agreed under the Scheme of Management and the Council will adopt a Land Management Plan that accords with the strategy.	Accepted - change made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 62	Mr Grover	2213	6362	<p>As someone who works in Carlew House, East Place I strongly object to the proposed service road from Windsor Grove to East Place. It would undoubtedly have a devastating and erosive effect on the site of Borough Nature Conservation Importance Grade II, and the area of SBNCI that is not lost would be adversely affected by the road building. The cost of the proposed road scheme seems impracticable for the few industrial buildings in East Place. The road building and subsequent pollution would disrupt the quality of work places in East Place and any road that is laid is apt to be blocked by cars, service and delivery vehicles that use East Place because there is no means of widening East Place. The very steep embankment for the railway line in this area is liable to subsidence and would require enormous shoring up. The vibrations from the road could endanger the stability of the railway line and again harm the quality of the work places on East Place and Windsor Close.</p>	<p>If the scrapyard is to be removed the land must be reinstated and investigated for inclusion in the existing site of Borough Nature Conservation Importance. The new UDP should say that development will not be permitted that exert adverse effects of Nature Conservation Sites.</p>	<p>Accepted - following an investigation of the costs, benefits and technical problems associated with the service road proposals it is proposed that this be deleted from the plan. Technical problems such as the constraints imposed by the narrowing due to the railway line make the scheme prohibitively expensive and of limited benefit. It is therefore proposed to delete this proposal. Policies relating to the protection of sites of Borough Nature Conservation Importance are already set out in UDP Policy 46.</p>
Policy 62	Mr A Boughton	2220	6390	<p>A large area of nature conservation will be consumed by this road after already being saved from development. Restrictions of buildings and railway embankment will make this road almost unusable especially with delivery lorries blocking it. Also the building of this road will make the whole area more susceptible to thieves and vandals, giving them ease of access and escape.</p>		<p>Accepted - following an investigation of the costs, benefits and technical problems associated with the service road proposals it is proposed that this be deleted from the plan. Technical problems such as the constraints imposed by the narrowing due to the railway line make the scheme prohibitively expensive and of limited benefit. It is therefore proposed to delete this proposal.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 62	M F Rugg	2242	5190	<p>I wish to register my objection to the proposed new service road from Windsor Grove to East Place as outlined. As a tenant of Carlew House I am mindful of the effect such a proposal would have on the immediate surroundings, in particular on the adjoining nature conservation site for which a reconstitution order was recently obtained following action by the Council.</p> <p>The access afforded by East Place is extremely restricted as is egress onto Pilgrim Hill from East Place - factors which one feels would have detrimental effect upon traffic movement.</p> <p>The proposal gives every indication of being unrelated to the existing conditions with regard to its environmental impact.</p>		<p>Accepted – following an investigation of the costs, benefits and technical problems associated with the service road proposals it is proposed that this be deleted from the plan. Technical problems such as the constraints imposed by the narrowing due to the railway line make the scheme prohibitively expensive and of limited benefit. It is therefore proposed to delete this proposal. It is not possible to force the allotments to be re-instated however as they are non-statutory and not Lambeth owned.</p>
Policy 62	Mr Matthew Perry	2243	5191	<p>Objects to an access road which would decimate an area of nature conservation importance the Council has fought to preserve. It will be a fly tippers paradise. East Place is continually used by all of us for loading and unloading. May have to close businesses to make plan work. Take no account of physical restriction to north off Pilgrim Hill.</p>	<p>If scrap yard has to go don't build industrial units no-one wants. Honour ecological commitments to a sustainable future.</p>	<p>Not accepted – the scrap yard is privately owned. There are no funds to compulsorily purchase it. Re-instatement of part of the site for nature conservation of part of the site is only likely to come forward through development of the remainder, and this site is well suited to commercial and mixed uses given the character of this area. It is proposed to clarify this by adding a MDO designation for the site (MDO 51c).</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO53	Diane Miller	1862	4071	<p>1. This site should be developed solely for commercial or community uses. The site would be inhospitable for housing.</p> <p>2. I object to use of this site for housing. As stated in the Council's UDP report, Lambeth is the most populous inner London borough. However, services and amenities (both public and private) in the area are dire compared with other boroughs. Before bringing more residents into the borough and increasing the population density, specifically in Norwood, the council must first provide adequate resources for current residents -such as more schools and childcare facilities, more employment opportunities, more surgeries, more quality green space, better transport, adequate parking, etc. I object to the proposal because the council should concentrate on providing adequate community and business resources for the current residents of Norwood before bringing more people into an already densely populated and under- served area.</p>	I would approve of the proposal if the site were retained for employment and community use only.	Accepted - This is the intention set out for this MDO.
MDO59	Ricky Renalls	1828	5123	Contradicts policy 1, 25, 26. Keep as community facility.	Remove MDO status.	Not accepted - if the site is no longer required for other community or educational uses, then it is likely that the site will be redeveloped for housing.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO60	Nicholas Long	2248	5207	Due to its failure to properly manage the South Metropolitan Cemetery, Lambeth Council urgently requires additional land to provide for immediate further burial space within the Borough (policy 45(M)) and to accommodate associated facilities (particularly equipment storage, vehicle maintenance and fuel tankage). In order to comply with various statutory and consistory court requirements, particularly relating to Health and Safety and listed buildings/conservation are legislation. Part of the Vale Street Depot site should be considered for any extension to the Cemetery to meet these needs with the frontage part of the site being designated for community use.	A reflection that Lambeth Council has considered the Cemetery's requirements and its obligation to meet them before allocating planning uses in direct conflict with the requirements.	Lambeth has 5-10 years spare cemetery capacity; hence there is no immediate requirement. But more pertinently, the change in levels and contamination makes the site unsuitable for cemetery use. In any event the site is still partly needed for waste use.
MDO62	Sally Wadsworth	2096	5262	Retain for exclusive community use. Keep all the open space, 'limited development' needs clarification and remove.		It is now proposed to retain the building for community use and to retain the open space and so the MDO has been deleted.
MDO63	Brixton Area Forum Board c/o Brixton Town Centre Management	2064	4934	Retain for community use.		This is exactly what is proposed. The site has now been developed for community use with ancillary offices, and therefore the MDO designation is to be deleted.
MDO66	G J Wragg	2246	5197	We have functioned successfully here for the past decade. We wish to continue. Lambeth should recognise our status in the art world. We have put the Oval works on the map.	We want to continue as we are. Ideally Lambeth should upgrade our building and help us. We think the value of the studios in the community is undervalued in comparison to offices etc.	The building is being sold for workshop use and this involves no planning change of use. This will include small workshop space suitable for artist's use.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO73	Transco (Lattice Property Holdings/Part of Lattice Group)	1675	2506	<p>Lattice Property and Transco are both part of the Lattice Property Group, which was formed on de-merger from BG Group in October 2000. Lattice Property looks after the general property interests of Transco and I am writing in connection with the proposals for Oval gasholder station, which Transco owns and operates.</p> <p>The gasholder site is designated as a Major Development Opportunity (ref. MDO 73) within a Key Industrial and Business Area. The holders are needed for the foreseeable future but within the Plan period up to 2017 it is likely that some of the core strategic policies, notably Policies 20 and 22, unreasonably constrain the uses, layout and design of a future redevelopment and prevent the site from achieving its full potential.</p> <p>In order that we can present our concerns at the Public Local Enquiry I am lodging a formal objection to MDO 73. When substantiating our case and suggesting changes to the Plan we may wish to refer to other policies in the Plan apart from site-specific MDO 73.</p>		It is unclear what change is sought.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 64	Clapham and Stockwell Town Centre Board	1770	3192	<p>This should be extended to include reference to the Stockwell Master plan because that document provides the context and local framework for developments in the area. Amendment: Hyde Housing is undertaking a major regeneration programme and not Stockwell Partnership. The SRB programme is about to go into its third year with two remaining.</p> <p>The area has been awarded EU funding of £6.5m (Urban 11 Community Initiative) -this programme will allow further targeted work on regeneration projects for seven years starting in 2002.</p>	<p>Given the existence of the Stockwell Master plan and its use in guiding developments and improvements locally, the Stockwell Partnership would support opportunities taken to secure planning gain through agreements made on appropriate planning applications within the area to provide contributions towards specific projects in the area.</p> <p>We would recommend that the form of words submitted by Stockwell Partnership is adopted and this will provide the context for the area.</p>	Accepted - All of the main Stockwell Master Plan proposals have been included in the plan.
MDO88	Stockwell Partnership	1719	2703	Would like to see more specific land use opportunities detailed in conjunction with the local community.		Not accepted - The purpose of the MDO designation is not normally to specify a land use as these are determined by the boroughwide policies.
MDO88	Mr E Mirzanli	2251	5112	Replace car park with sports facilities.	Remove MDO.	Not accepted - The purpose of the MDO designation is not normally to specify a land use as these are determined by the boroughwide policies.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO90	Diane Leslie	2057	4834	It could be use for children	Playground for children	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO90	Union Grove Community Nursery	2058	4835	It could be use for children	Playground for children	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.
MDO90	Sharon Pounds	2059	4836	We would like the previous playground bought back to it use to be adventure playground.	Adventure playground , so the young children can have something positive to do with themselves.	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO90	Debra Coventry	2060	4837	Previous plans, an adventure playground for the community.	Adventure playground, for young individuals within the community, the playground will be a safe and secure environment for children to play, a needed project.	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.
MDO90	Marcia Buchanan	2061	4838	Children's play area for them to use.	A big play development area for children to use.	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO90	Kabifa Sharma	2062	4839	Children needs playground to play most the children don't have garden and need to be active.	Our children need a safe place to play as there isn't lot of play area for them to use need that play ground to be open.	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.
MDO90	Natasha Forchin	2063	4840	Play area for children's use.	Playground for the children.	Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO90	Stockwell Community Creche	2067	4984	The playground is an amazing facility for children.		Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.
MDO90	Emma Mizzi	2068	4986	The facility has been used by many children over the years including myself when I was a child. I feel that it is a valuable resource which provides excellent services for all children not only in the area but also children attend from outside the area.		Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO90	Diane Senior	2070	4992	The adventure playground is a good facility for the children, we object to it being closed.		Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.
Policy 66	Thomas & Jenny Collet-White	2217	6367	<p>I strongly support the development plan. I support measures to reduce traffic congestion's and feel a full review is required to consider ways to improve traffic flow e.g. one way systems.</p> <p>I feel strongly that Ice rink should be retained and improved and possibly developed to regional standard. I also feel other leisure facilities on the same site should be retained and improved /e.g. swimming baths.</p> <p>I strongly oppose the development of another supermarket on the Ice Rink site. I would like to see ABC Cannons cinema site developed as a cultural/ community centre and public transport system to be improved to support the developments.</p>		Not accepted - any supermarket application will be assessed against Policy 5 and MDO91.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 70	Helen Lindsay	2247	5201	I support the changes being made to Vauxhall Cross with the opening up of the river and transport axis. However, I am very strongly against a major development along the railway arches situated by Vauxhall Park. While this area would benefit from some development after greater community consultation, the current plan which involves building on most of Vauxhall Park and the demolition of the Vauxhall Tavern Pub would be extremely detrimental to the people living in the area as it would create an alienating and inappropriate development which would increase traffic and cater for people passing through or from out of the area. It appears to be a commercial development hidden under the banner of regeneration at the moment. A modest development along the arches would be far more appropriate.		Presumably, the objector is referring to Spring Gardens not Vauxhall Park. The plans for Spring Gardens have been dropped some time ago and form no part of the current plan.
Policy 70	Mr E Mirzanli	2251	5111	Too vague.	Improve. Remove ref to Focus Vauxhall.	It is unclear how this policy is deemed to be "too vague". Nevertheless the policy is proposed to be expanded to further explain what is expected in terms of the redevelopment of this area.
MDO103	Ladbrooke Investments Ltd c/o Zeckler and Co	1993	4580	Ladbrooke Investments does not support the proposed supporting text, which could or could not be retained on redevelopment.	Ladbrooke Investments seeks the removal of the sentence beginning 'Retention of original...' and ending '...Keybridge House encouraged.'	Not accepted - the Council considers that this building is worthy of retention, along with others along Bondway. It will fall within a proposed extension of the Vauxhall Conservation Area.
MDO105	Mr E Mirzanli	2251	5119	Flawed Proposal	Remove MDO	Not accepted - it is not considered that the MDO proposal is flawed.
MDO106	Clapham and Stockwell Town Centre Board	1770	3198	A development brief for this site should be prepared with full local consultation		Noted - however this is a matter of implementation rather than Plan policy.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO110	Waterloo Town Centre Board	1894	4324	This contains reference to demolition of Lambeth Walk shopping centre, developments around Lambeth Walk Open Space, and non-contiguous unsafe POS. The maps also designates Lambeth Walk Open Space as a Parks Regeneration Area.	<p>1) Remove any reference to the demolition of the Lambeth Walk shopping area.</p> <p>2) Change "That Lambeth Walk Open Space being designated as a Park.</p> <p>MDO 110 (c) to read "Improving Lambeth Walk Open Space as a contiguous Public Open Space."</p>	<p>1)Not accepted - Lambeth is not proposing substantial demolition. Any amendment to the MDO has been included to this effect.</p> <p>2) Partly accepted – in the past the land has not been recognised as public open space by Lambeth. The adopted Unitary Development Plan (Fig 10.1) shows that the Kennington Road frontage as outside the boundary of the Lambeth Walk public open space. This was upheld in a Judicial Review of the case of Glosby V London Borough of Lambeth. However the Council accepts that the site can form a useful extension to the adjoining Lambeth Walk Public Open Space, enabling it to better fulfil its function as a local park, in an otherwise dense urban area, and to give it a more prominent frontage along Kennington Road. Accordingly it is proposed to designate the area as Public Open Space in its new Unitary Development Plan.</p>
MDO110	Jackie Spring	1911	4376	Lambeth Council deliberately run down Lambeth Walk. Not once did they ever advertise the empty shops. Now that all the shops are opening (no thanks to Lambeth) they are planning on demolishing them. No demolition. Refurbish.	<p>We want:</p> <ol style="list-style-type: none"> 1. CCTV Cameras 2. Better lighting (street lamps) and as for Lillian Baylis School turn it into a recreation centre for the whole community. 3. No demolition 	<ol style="list-style-type: none"> 1. Accepted - subject to funding. CCTV would be part of a package of measures to improve security in the area. 2. Noted - however, if not suitable and/or viable for educational/community use for which there is local demand, then redevelopment for a mix of uses including housing would be expected. 3. Not accepted. Lambeth is not proposing substantial demolition. Any amendment to the MDO has been included to this effect.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO110	T Tolani	1983	4539	With the block opposite done, I see no reason to disrupt the lives of people who have lived in the area for so long. The shops are convenient for the local community and together as one, we all cannot see what can be gained by pulling the block down.		Not accepted. Lambeth is not proposing substantial demolition. Any amendments to the MDO has been included to this effect.
MDO110	Mrs Owusu-Agyemang	2214	6364		Money could be invested to build more Nursery Schools for the area. Lilian Baylis School, Lambeth Walk and Ethelred Estate all could be given a major repair work, not demolition please.	Not accepted. Lambeth is not proposing substantial demolition. Any amendment to the MDO has been included to this effect.
MDO110	Mr Owusu-Agyemang	2215	6365	There is nothing wrong with the buildings ie foundation, therefore the Council need not to demolish the whole of Ethelred Estate including the Lambeth Walk - a major repair is all that is needed for the whole estate. Besides the money for the new buildings, could better be invested in another area - may I suggest Education.		Not accepted. Lambeth is not proposing substantial demolition. Any amendment to the MDO has been included to this effect.
MDO110	John Neary	2219	6369	I rely on the local shop for all my needs, we have all the facilities we need no more supermarkets, help the shops. Leave the people to get on with their business . Lambeth has been trying to get rid of the shops and homes. Why?	All we need is a face lift in the walk. No more new shop! Help the traders by giving them newspaper fronts, better highling. Also, turn the Lilan Baylis in a shelter for the old. No demolition.	Accepted - it is not proposed to get rid of shops and homes.
MDO110	Ethelred Tenant Management Organisation	2224	5056	The Lambeth Walk shopping area has not 'failed'. Many of the shops are occupied and others are in the process of being let. The shops are an integral part of the estate for local residents and the prospective tenants of the new development at Lupins Court. Additionally, there is no mention of what would happen to the 48 flats above the shops at Pory House.	Nothing where the word demolition is used.	Accepted - this will be designated a local parade, and will be shown as such on the proposals map.
MDO110	Mr E Mirzanli	2251	5114	Not sound, contradicts policy 1 and various PPG.	Remove - no stock transfer.	Not accepted - the MDO designation does not contradict Policy 1 nor any PPG's

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 73	Anne and Mike Burke	1631	3220	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard and a large open space at its southern end, known as the podium site, which covers an underground car park. The Shell podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of the disputed policy/MDO/proposal map, might</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and the amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted in part – The Shell podium site is now considered by the Council to be public open space and MDO 115 has been amended to reflect this. Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft :</p>		
				<p>POLICY 7 Protection of Residential Amenity</p>		
				<p>POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.</p>		
				<p>POLICY 38 River Thames, Protection, Use and Access</p>		
				<p>POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area, the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.</p>		
				<p>POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.</p>		
				<p>POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.</p>		
				<p>POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river', and a place with a flourishing, cohesive and inclusive residential community</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 73	Robert Allison	2116	5297	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end, known as the podium site, which covers an underground car park. The Shell podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of the disputed policy/MDO/proposal map, might</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and the amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted in part – The Shell podium site is now considered by the Council to be public open space and MDO 115 has been amended to reflect this. Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft :</p>		
				<p>POLICY 7 Protection of Residential Amenity</p>		
				<p>POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.</p>		
				<p>POLICY 38 River Thames, Protection, Use and Access</p>		
				<p>POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area, the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.</p>		
				<p>POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.</p>		
				<p>POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.</p>		
				<p>POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river', and a place with a flourishing, cohesive and inclusive residential community</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
5.16.5	Coin Street Community Builders	1589	6309	This paragraph states that 'the blight and decline noticeable 10 years ago has been replaced by feverish activity' whereas paragraph 5.16.18 says that 'the current disconnected, oppressive and run down nature of much of this area is at present a disincentive for investment.' We fail to see how both of these statements can be true. Each would require a completely different policy response.		Not accepted - paragraph 5.16.5 relates to the state of economic activity and interest in the Waterloo area, which has seen a marked transformation over the last decade, as investors realise its true potential as a Central London location. Paragraph 5.16.18 relates to Policy 75, and the urban design character of the Waterloo area, which, despite renewed investor interest, is still in need of improvement to the public realm, pedestrian movement, and other considerations which improve the perception of the area, between buildings.
Policy 74	Coin Street Community Builders	1589	6310	We cannot see that it is a realistic strategy to rely on developer contributions to fund an increase of capacity at Waterloo Station whilst maintaining that 'an expansion in public transport capacity will be needed to support the scale of development proposed.'		Not accepted - the seeking of contributions to fund new infrastructure is a common strategy used to provide adequate infrastructure to new development. The Council may seek contributions, appropriate to the scale and kind of development proposed.
Policy 75	Coin Street Community Builders	1589	6311	The only satisfactory way for disabled people and wheelchair users to cross the river from Waterloo Station is to do so on the downstream side of Hungerford Bridge. The Plan's current proposal suggests an upstream crossing which would require such users to come off the Bridge at Northumberland Avenue, presumably using a new lift. By crossing from the Waterloo Station concourse via Cab Road and a ramp to a walkway on the downstream side of the Bridge, wheelchair users and others would be able to connect both to the Royal Festival Hall and to Charing Cross and the Strand without needing to use a lift. Planning policy should be to safeguard and encourage the provision of this downstream route.		Not accepted - The Council acknowledges the importance of the provision of a wheelchair accessible route from Waterloo Station to Hungerford Bridge, however its preferred route is via the Shell Building to the upstream side of the bridge. There are a number of technical difficulties in the route proposed by the objector, particularly how to get across the railway line.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 75	Jez Feeney	1768	3120	There should be no development anywhere in the magnitude of 40,000sqm previously suggested. I object because this policy is not clear in terms of density and height.	Insert after item (h) at end of line "...and not anywhere in the magnitude of 40,000sqm".	Not accepted - It is not understood where the reference to 40,000sqm of development is made. Other Plan policies deal with issues of density and height, therefore it is not necessary to repeat them again in this policy.
Policy 75	Nicola Howey	1769	3132	There should be no development anywhere in the magnitude of 40,000sqm previously suggested. I object because this policy is not clear in terms of density and height.	Insert after item (h) at end of line "...and not anywhere in the magnitude of 40,000sqm".	Not accepted - It is not understood where the reference to 40,000sqm of development is made. Other Plan policies deal with issues of density and height, therefore it is not necessary to repeat them again in this policy.
Policy 75	Julie Nunn	1837	3725	There should be no development anywhere in the magnitude of 40,000sqm previously suggested. I object because this policy is not clear in terms of density and height.	Insert after item (h) at end of line "...and not anywhere in the magnitude of 40,000sqm".	Not accepted - It is not understood where the reference to 40,000sqm of development is made. Other Plan policies deal with issues of density and height, therefore it is not necessary to repeat them again in this policy.
Policy 75	Waterloo Town Centre Board	1894	4315	There should be no development anywhere in the magnitude of 40,000sqm previously suggested. I object because this policy is not clear in terms of density and height.	Insert after item (h) at end of line "...and not anywhere in the magnitude of 40,000sqm".	There is no item (h) in the policy. The UDP does not attempt to predict or prejudge the amount or scale of development that may be acceptable in Waterloo. This would be most unwise in advance of any major studies on the capacity of the station and the capacity for development and the visual impact of such development. As such, there would be no planning basis for such a cap. The proposed wording would be vague and unclear, what scale of development would be suitable, would it all be suitable on one site? Rather the UDP sets down criteria and tests for development that comes forward.
5.16.24	Coin Street Community Builders	1589	6312	There seems little point in requiring developers to include new areas of public open space if they can just close it for years on end, with the knowledge of the Planning Department, as has been the case with the White House.		No alternative wording is suggested, therefore no consideration for changing the paragraph can be made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
5.16.25	Coin Street Community Builders	1589	6313	We object to the suggestion that part of the Doon Street development would be new public open space. The new open space which we envisage will be to service the new housing and is likely to be provided at higher level.		Not accepted - The site is located within an area where there are high numbers of tourists, and which is expected to be subject to significant new development. The site is also to accommodate a new sports centre (including public swimming pool). In the interests of good urban design, some public open space should be incorporated into the site's redevelopment.
5.16.26	Coin Street Community Builders	1589	6315	As with much of the Plan, this is a coded statement, which means little to the reader.		Not accepted - The Council considers that this paragraph is clear in its meaning.
Policy 77	D A Weighton	2244	5193	Any major retail development at Waterloo Station or at Shell or South Bank Centre will harm existing shops and market at Lower Marsh, because they cannot physically integrate with them such that pedestrians flow freely between them all. York Road is not and never will be a High Street, shops are opened and closed at will by the landowner. Existing permission recently are for office development only. The plan should seek to encourage users of the York Road area - commercial and residential to patronise Lower Marsh and the Cut as traditionally was the case. Leake Street is a key part of this.		Accepted – Because this policy is proposed to be deleted, applications instead to be assessed in accordance with Policies 4, 5, and 29 in the same way as for all other centres in the borough, the core of the centre at Lower Marsh will receive the maximum protection possible through the sequential approach set out in PPG6.
5.16.31	Coin Street Community Builders	1589	6316	It is unclear how Lambeth would police the proposed policy that shopping around York Road should be complementary to and not competing with Lower Marsh.		Noted - Policy 77 is proposed to be deleted, and assessment of all proposals for the development of town centre uses will be made under Policies 4, 5 and 29. Each case will be assessed on its merits, with the objective that development outside of the town centre (centralised around Lower Marsh) and its reduced centre edge, does not adversely impact upon the vitality or viability of the centre itself.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 79	County Hall Owners & Residents Association	2024	4705	Paragraph (C) This will impose an obligation and responsibility not to crowd this striking structure. It is the largest thing In Waterloo, and needs a correspondingly uncluttered setting if the area is not to become claustrophobic and closed, and the Eye itself hemmed in by poorly thought through retail and leisure development.		Accepted - this has already been achieved via a S106 agreement.
Policy 80	Graham Brown	1633	3223		Add "Any changes and improvement should be referred to Waterloo Town Centre Management Board and the friends of Jubilee Gardens".	Not accepted - Legally the UDP must set out policy. It may not delegate matters to specific groups. The local planning authority must make planning decisions on planning grounds, costs can be awarded against it on appeal if it solely decides applications on the results of public consultation. Government guidance states that plans are not appropriate places for setting out consultation mechanisms.
Policy 80	Waterloo Town Centre Board	1894	4320	Jubilee Gardens should be grassed over, up to the existing railway viaduct, as per current UDP. There should be no loss of any open space whatsoever. This debate must first be had with both the Waterloo & Kennington Housing Forum and Friends of Jubilee Gardens.	Insert within 2nd paragraph, after "...The improvement and extension of Jubilee Gardens, in collaboration with the Friends of Jubilee Gardens/ Waterloo & Kennington Housing Forum, with world class..." Insert within 3rd paragraph, after "...Development around Jubilee Gardens, in collaboration with the Friends of Jubilee Gardens/ Waterloo & Kennington Housing Forum, should frame..." Change: Insert after 4tl1 (last) paragraph, "...Hungerford Footbridge is permitted, provided that there is support demonstrated by the Friends of Jubilee Gardens/ Waterloo & Kennington Housing Forum."	Accepted - It is proposed to amend the policy to reflect the objectors concern. The whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge will be designated as MOL (including the access road).

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Policy 80	Michael Wolfers	2245	5196	The Waterloo residential and working communities have for years supported a public park to Hungerford Bridge and would be betrayed by any dedesignation of the Metropolitan Open Land. Strong objection to any exemption or extension of service road from the plan to create a park worthy of the neighbourhood and or London as a whole. The existing service road should form part of the Metropolitan Open Land and of the Jubilee Gardems public open space as a ground level park.	The existing service road should form part of the Metropolitan Open Land and of the Jubilee Gardens public open space as a ground level park.	Accepted - The amended policy will also reflect the objetors concern that the whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge be designated as MOL (including the access road).
MDO113	Association of Waterloo Groups	1585	2556	Strongly SUPPORT but does it need to include non local buses?		Noted - However, which buses use a bus station is not a planning matter. If planning permission is granted for a bus station as part of the Waterloo Station redevelopment, it is not for the UDP to stipulate which buses can and can not use this facility.
MDO113	Ray Puckey	1762	3022	There should be no development anywhere in the magnitude of 40,000sqm previously suggested. I object because this policy is not clear in terms of density and height.	Insert after item (h) at end of line "...and not anywhere in the magnitude of 40,000sqm".	Not accepted - It is not understood where the reference to 40,000sqm of development is made. Other Plan policies deal with issues of density and height, therefore it is not necessary to repeat them again in this policy.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO115	Robert Allison	2116	5296	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end, known as the podium site, which covers an underground car park. The Shell podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and the amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted: The Council now accepts that the podium space is public open space. Shell's recent application for a mixed use development on the podium site was refused, with insufficient justification in relation to the need for such a retail facility in this location, and loss of public open space being cited as the key reasons for refusal. Amendments are proposed to this MDO so as to reflect the Council's decision that the site should constitute public open space and its desire – and that of the majority of objectors to this MDO – to retain the openness afforded to the immediate area by this open space. The issue of loss of light is a detailed matter that will be dealt with in considering a detailed planning application for the site. The day lighting and sun lighting study submitted with any application will have to show that the impact is within acceptable limits.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>the disputed policy/MDO/proposal map, might lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft :</p>		
				<p>POLICY 7 Protection of Residential Amenity</p>		
				<p>POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.</p>		
				<p>POLICY 38 River Thames, Protection, Use and Access</p>		
				<p>POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area, the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.</p>		
				<p>POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.</p>		
				<p>POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.</p>		
				<p>POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river', and a place with a flourishing, cohesive and inclusive residential community</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO115	Prospect	2226	5080	MDO 115 Shell Centre Upstream; and MDO 116 South Bank Centre We note that there appears to be an inconsistency on Page 168 relating to MDO 115 and MDO 116 in that the annotation on the proposals map does not match that in the plan. The MDO reference numbers for these two sites appears to have been switched.	Amend the text on Page 168 to swap the MDO reference numbers of MDO 115 and MDO 116.	Accepted - Changes made to text and proposals Map.
MDO116	Mayor of London	1480	3580	(g) This sentence should be expanded to include reference to servicing not having a negative impact on public transport and local traffic flows. (i) It should be clear that the Hungerford car park is intended to be relocated to the Shell Centre.	Change (g) :“The scale of the development will require efficient servicing proposals and examination of alternative servicing options, that do not have a negative impact on the quality of public realm, pedestrian flows, bus operations, and local traffic.” Change (I):" no increase in car parking with the Hungerford car park relocated to the Shell Centre car park."	Not accepted - it is considered that other policies in the plan cover the additional issues of impacts upon public transport and local traffic flows sufficiently. Although the Council has a strict policy on traffic restraint and is seeking to minimise off street car parking, the UDP can not go as far as specifying relocation of land uses between two private land owners.
MDO116	Coin Street Community Builders	1589	6320	We strongly object to the proposed demolition and replacement of the Queen Elizabeth Hall, the Hayward Gallery and the Purcell Room.		Accepted - This sentence of MDO116 is proposed to be deleted.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO116	Doris Newnham	1729	2753	Allied to this is the Council's view of the South Bank Centre as a Major Development Opportunity (MDO 116). The boundary of this area on the Proposals Map includes the whole of Hungerford Car Park (Note: the map incorrectly names this site as MDO 115). The Council is therefore promoting major development on the MOL This is totally unacceptable.		Accepted – A consultant's study (BDP) commissioned by the Council to assess the issues surrounding the potential planning conflict between these two designations of Hungerford Car Park in the light of objections to the initial Deposit Draft UDP, has recently been completed. The report concluded that the designations are generally in conflict with each other and that in this instance, the only reason to entertain the dual designation would be for the benefit of the expansion of the South Bank Centre. The South Bank Centre's aspirations to develop the Hungerford car park site have to be balanced against the case to improve the existing adjacent open space and extend over this site. The Council has now more fully considered the relative merits of allowing SBC to expand on to this site versus extending Jubilee Gardens onto the Hungerford Car Park site and creating a world class public open space on the MOL land, and considers that the latter is the prudent way to proceed. In the light of the substantial development pressures and the priority given to open space protection and enhancement, the Council concludes that there is a stronger case for the car park to be used as open space than to extend the South Bank Centre over all or part of the Hungerford car park site. Following on from a recommendation in the consultants study, it is now proposed to put together a planning brief for the existing South Bank Centre site in order to maximise development

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO116	Waterloo Town Centre Board	1894	4353	The Shell Podium site should be designated as public open space.		options for their future aspirations. The MDO designation for the South Bank Centre on the Proposals Map will therefore be redrawn to exclude the Hungerford Car Park site. The car park site itself will be re-designated with a Parks notation (in addition to its current MOL designation) signifying the Council's intention that the site should become part of Jubilee Gardens public open space. This appears to be an objection to the wrong policy. Please see responses to MDO 115.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO116	Pearman Street Residents Association	2221	6391	<p>1 The MOL should continue extend up to Hungerford Bridge. Past use of the strip of land beside the bridge for access to the Royal Festival Hall is insufficient reason to dedesignate this zone.</p> <p>Contrary to the Council's statement, the zone has been in continuous use as public open space for in excess of 22 years. It has been walked over for access to the open areas beyond and can be viewed over thus effectively forming part of the open spaces. The de-designation of the strip is inappropriate when viewed against the criteria of RPG3 andPPG2.</p> <p>The Council's argument for retention of the service road is based on a seriously flawed analysis conducted by the South Bank Board, who have a vested interest in keeping the road. underground servicing is not the inevitable consequence of road closure as sufficient ground level space for access exists already to accommodate projected needs. The Council also states that underground servicing would be 'prohibitively expensive as it would mean tunnelling under the water table'. To a Civil Engineer this is laughable. Tunnelling would be totally the wrong technique to use in these circumstances, and the water table is no significant obstruction. Witness the large number of buildings along the Thames with deep basements for example County Halland the South Bank Centre itself.</p> <p>The width of the of the strip of land to be reserved for continued use as a service road for the Festival Hall is undefined in the text and impossible to adequately ascertain from the map attached to the Plan, owing to its scale. Its width has a material influence on the size and usefulness of the MOL.</p> <p>The reference to "modern standards" in this</p>		Accepted – For the reasons set out in the response to Objection A above, the Council considers it appropriate to designate the whole of the Hungerford Car Park site, including the access strip, as MOL.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

matter carries no rationale, explanation, or justification. It merely conforms to the private opinion of the present landowner (South Bank Board). The landowner currently has a planning Application before the Council to extend the width of the strip of land used for a service road and to continue to use it as a service road in perpetuity .

2 The Council states they will de-designate Hungerford Car Park if the South Bank Board produces an 'agreed master plan' and can show 'exceptional circumstances'. Neither of these terms is properly defined nor are any criteria or conditions given. Further, it is totally inappropriate to offer deals to particular landowners in a UDP. In any event there must be no such development on the MOL.

Allied to this is the Council's view of the South Bank Centre as a Major Development Opportunity (MDO 116). The boundary of this area on the Proposals Map includes the whole of Hungerford Car Park. (Note: the map incorrectly names this site as MDO 115). The Council is therefore promoting major development on the MOL. This is totally unacceptable.

3. Policy 80 calls for both Jubilee Gardens and Hungerford Car Park to be protected, extended and improved as public open space. This stands in stark contrast to the Council's view of Hungerford Car Park as a major development opportunity (MDO 116). Any such development on the public open space is unacceptable. The statements in paragraphs 5.16.39 and 5.16.40 are supported, except that the MOL should extend up to Hungerford Bridge itself.

4 Jubilee Gardens and Hungerford Car Park are also shown on the map as a Parks

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>Regeneration area. Policy 45 (A) says development will not be permitted on such land except for maintenance or enhancement of the park. However, section (C) of the policy allows the loss of open space, where an improvement to the park is achieved in conjunction with a development. This may be appropriate where ragged edges to a park are tidied up but it is wholly inappropriate to Jubilee Gardens and Hungerford Car Park. Similarly any net loss of open space is totally unacceptable. It should be noted that Metropolitan Open Land is a more important designation than a Parks Regeneration Area.</p> <p>5. The Proposals map shows a winding strip of land between the park boundary of Jubilee Gardens and the MDO boundary. This corresponds to an existing footpath and road which is actually part of the gardens and should therefore be included as part of them.</p> <p>6. The Proposals Map shows an area between County Hall and the North and South Blocks as Public Open Space. In fact this space is occupied by the extensions to the North and South Blocks. It is not therefore available as public open space.</p>		
MDO116	Prospect	2226	5081	<p>MDO 115 Shell Centre Upstream; and MDO 116 South Bank Centre</p> <p>We note that there appears to be an inconsistency on Page 168 relating to MDO 115 and MDO 116 in that the annotation on the proposals map does not match that in the plan. The MDO reference numbers for these two sites appears to have been switched.</p>	Amend the text on Page 168 to swap the MDO reference numbers of MDO 115 and MDO 116.	Accepted - changes made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO118	Coin Street Community Builders	1589	6321	The peninsularisation of the Westminster Bridge roundabout has proved a disaster and should be removed.		Not accepted - The peninsularisation work was a requirement of the 1999 approved 1 Westminster Bridge Road office scheme, and its retention has been a requirement for subsequent proposals for that site. It can not simply be removed at this time.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO125	Ricky Renalls	1828	5092	<p>The issue isn't about the community centre but the swimming pool.</p> <p>Transport Links</p> <p>Is it appropriate to put a swimming pool on the Southbank, when the site specified is extremely poorly served by public transport, and largely inaccessible -particularly from the Lambeth side.</p> <p>Location</p> <p>The traffic throughput seems to be geared towards business users rather than the community. This is because such a treasured resource would only serve a limited area of Waterloo (i.e. Coin Street Stamford St/Peabody and equivalent area around North Southwark.</p> <p>Alternative location</p> <p>It seems that the UDP' of yesteryear, the original site identified for North Lambeth was on Kennington Rd, behind' Ethelred Youth Club. This land is still vacant. The advantages of this site are:</p> <p>i) It would open the facility up to the Ethelred/China Walk (new/old)/ Kennington/Oval. These are large estates with many deprived communities.</p> <p>ii) It has excellent transport links, and is wholly accessible. iii) It is central within N Lambeth.</p> <p>iv) It would diffuse the majority view that a majority of resources go to the South bank</p> <p>Firstly, it is wholly inappropriate that Shell should be negotiating with local developers on matter of 5106, to a view of making a substantial contribution. Where is the Transparency/Openness in this? The application of 5106 should be a Member decision. It is not for developers (or local developers) to set Borough priorities.</p> <p>Proposal</p> <p>i) That a bottom up community led feasibility study be done. This should be done through the Town centre drawing on both the Waterloo/KOV</p>		<p>Not accepted – firstly the issue of the alternative site that has been suggested on Kennington Road. This is outside any established centre; it is not as well located for public transport as the Doon Street Site. It has planning permission for housing and is not available for development. All major leisure developments such as this are governed by the government's 'sequential approach' (Policy 5) as such it would militate against an out of-centre site such as the one suggested. In Croydon and Brent, the Mayor of London and/or GOL has objected to such sites on this basis. In addition, there is no funding for such a location. The Doon Street site has been intended for community use as the last phase of the Coin Street project for 20 years. Opinion surveys for Coin Street Community Builders and the South Bank Employers Group indicate that sporting facilities are those most demanded by both residents and workers/visitors to the area. This proposal has been subject to extensive public consultation by these groups and by the Borough in the UDP key issues paper when this site was the most favoured. Most critically, however, it is the only site that is capable of attracting private sector, planning obligation and national lottery funding. It may not be ideal in serving Vauxhall, however it is much better located than a Vauxhall location for the vast majority of the objectors, and it can serve North Southwark.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
-------------------	--------------------	------------------------------	----------------------------------	----------------------------	-----------------------------------------	----------------------------

community members. This will prevent anyone interest group monopolizing the study. This should be done in a similar fashion to the current Emma Cons and Library studies, where there is mainstream community buy-in.

- ii) This group should look at location and funding as part of the study
- iii) The Shell 5106 should be ring fenced and used to fund the study and make a contribution towards the build.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO125	Waterloo Town Centre Board	1894	4321	I do not feel that Doon Street is an appropriate location for a swimming pool. This is on the grounds of inaccessibility due to location and very poor transport links. In addition a community swimming pool on the edge/border of the borough would not adequately serve the larger communities of Lambeth.	Insert after Upper Ground, " provided there is support demonstrated throughout the Waterloo & Kennington Housing Forum and the North Lambeth Town Centre'	Not accepted – firstly the issue of the alternative site that has been suggested on Kennington Road. This is outside any established centre; it is not as well located for public transport as the Doon Street Site. It has planning permission for housing and is not available for development. All major leisure developments such as this are governed by the government's 'sequential approach' (Policy 5) as such it would militate against an out-of-centre site such as the one suggested. In Croydon and Brent, the Mayor of London and/or GOL has objected to such sites on this basis. In addition, there is no funding for such a location. The Doon Street site has been intended for community use as the last phase of the Coin Street project for 20 years. Opinion surveys for Coin Street Community Builders and the South Bank Employers Group indicate that sporting facilities are those most demanded by both residents and workers/visitors to the area. This proposal has been subject to extensive public consultation by these groups and by the Borough in the UDP key issues paper when this site was the most favoured. Most critically, however, it is the only site that is capable of attracting private sector, planning obligation and national lottery funding. It may not be ideal in serving Vauxhall, however it is much better located than a Vauxhall location for the vast majority of the objectors, and it can serve North Southwark.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO127	Coin Street Community Builders	1589	6322	Although we have not yet produced detailed plans for any redevelopment of Gabriels Wharf, we object to the proposed 'retention of a through pedestrian link from Upper Ground to Riverside Walk.' Such a link exists via Bernie Spain Gardens and it may well be more satisfactory for the public to move around the development rather than through it.		Not accepted - it is a general Council policy to encourage pedestrian links from the Riverside Walk to streets to the east and south. There is a direct pedestrian link through the site at present, and good urban design would suggest that it should be retained in some form as part of any redevelopment.
MDO128	Coin Street Community Builders	1589	6323	We object to the through pedestrian link (see above) and also the retention of the 'historic frontage' building at 58 Upper Ground. This is a twentieth century frontage with a trompe l'oeil side elevation.		Not accepted - It is a general Council policy to encourage pedestrian links from the Riverside Walk to streets to the east and south. There is a direct pedestrian link through the site at present, and good urban design would suggest that it should be retained in some form as part of any redevelopment. It is the Council's position that this building makes a positive contribution towards the Conservation Area within which it is located, and should therefore be retained. The normal tests in PPG15 will of course apply at the time of any future application for planning permission to redevelop the site.
MDO129	Coin Street Community Builders	1589	6324	There are covenants requiring Hatfields to remain in public use 'for an open space recreation area for use by the general public.' The report 'Enhanced sports facilities on the South Bank,' Lifschutz Davidson, January 2002, has brought forward proposals which are supported by the school, ourselves, and others.		Noted - The recent Council approval for the redevelopment of open space on the Hatfields site for active sports playing purposes has necessitated the revision of this MDO. It no longer refers to Hatfield's.
MDO130	Waterloo Town Centre Board	1894	4322	What is the policy	Delete	See Response B, both sites now incorporated into a single MDO.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
MDO132	Coin Street Community Builders	1589	6325	We trust that the Council has fully consulted the New Cut Housing Co-operative about its proposal to include their homes in a Major Development Opportunity. Without evidence that it has done so, we should register an objection to this proposal.		Noted – the affordable housing has been included within the MDO area so as to give the maximum level of flexibility to any future developer. The MDO does require that the affordable housing be replaced should any approved scheme require the use of the site of the existing affordable units. It may be that a future developer may wish to keep the affordable housing fronting the Cut and develop only the land to the rear. This would also satisfy the MDO. This housing was built in the early 1980s and although attractive internally, externally is poor quality and under-uses the site. The existing houses are not in a conservation area and not worthy of protection in character or design terms.
Proposals Map	John Peer	1559	2914	The Proposals Map shows an area between County Hall and the North and, South Blocks as Public Open Space. In fact this space is occupied by the extensions to the North and South Blocks it is not therefore available as public open space.		Agreed - change made
Proposals Map	Lambeth and Wandsworth Group - Council for the Protection of Rural England	1564	2923	The Proposals map shows a winding strip of land between the park boundary of Jubilee Gardens and the MDO boundary This corresponds to an existing footpath- which is actually part of the gardens and should therefore be included as part of them		Noted - it is not considered that any change is necessary.
Proposals Map	Lambeth and Wandsworth Group - Council for the Protection of Rural England	1564	2924	The Proposals Map shows an area between County Hall and the North and, South Blocks as Public Open Space. In fact this space is occupied by the extensions to the North and South Blocks it is not therefore available as public open space.		Accepted- change made.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Proposals Map	Coin Street Community Builders	1589	6345	<p>We object to the Proposals Map on the basis that it is impossible to read all the different zoning and other designations, particularly in the Waterlook area.</p> <p>We assume that the Doon Street site - MDO 125 - is in the Waterloo Visitor Management Area. If not, it should be.</p>		The revised deposit proposals map will be much clearer and has corrected these errors. The Doon Street site the subject of MDO125 is within the Waterloo Visitor Management Area.
Proposals Map	Waterloo Town Centre Board	1894	4325	<p>I felt that the map provided was too small. Whilst it complies with the statutory minimum requirement, the size does not facilitate effective examination.</p> <p>The map has errors with respect to some boundaries, e.g. County Hall site, the Waterloo Visitor Management Area - this cuts straight through housing.</p>		The revised deposit proposals map will be much clearer and has corrected these errors.
Proposals Map	Sally Wadsworth	2096	5263	<p>The key does not clearly identify the Waste Management and Manufacturing Areas (the line is too light).</p> <p>Does West Norwood KIBA have a dual designation?</p>		Accepted- The colouring of the Waste Management and Manufacturing Areas will be made clearer on the Proposals Map. West Norwood Key Industrial Business Area is not within a Waste Management and Manufacturing Area.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Proposals Map	Vivien Aylmer	2113	5288	<p>I strongly support Policy 45(J) which refuses loss of allotments. However, I object to the boundary shown for the Lorn Road Allotment Site on the Proposals Map. This is a long relatively narrow site with a single access at one end from a piece of land owned by the Council. This piece of land is essential to the functioning of the allotment site and should therefore be included within its boundary. It must provide access for the heavy vehicle required a few times each year to remove rubbish, and it must provide a few car parking spaces for allotment holders. (There are no storage facilities for tools on the site, and some allotment holders travel significant distances. Occasional parking is essential when carrying out heavy jobs, collecting crops, bringing in manure, etc.).</p> <p>Also, the trees and vegetation on the access area contribute to the site's value for wildlife (it is also classified as a site of value for wildlife conservation) and the access provides a buffer between the residential uses and the site of value for nature conservation</p>		Accepted- The access road will be added to the Lorn Road Allotments on the Revised Deposit Map.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Proposals Map	Robert Allison	2116	5299	<p>The Shell Centre Upstream site currently comprises office buildings looking into a central courtyard AND a large open space at its southern end, known as the podium site, which covers an underground car park. The Shell podium site is extensively used (and has been since the Shell Centre was built over 40 years ago) by the public as a thoroughfare and recreation area, by children as a play area, by young people as a sports area, and by tourists as a photographic viewpoint, since it affords the most complete view of the London Eye on the south side of the river.</p> <p>Furthermore, building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall which has always had the benefit of open space between Chicheley Street and The Shell Centre. In its current form, POLICY 73 removes all protection for residential amenities in the Office Regeneration and Visitor Management Areas, making second class citizens of the many thousands of people who live on the South Bank. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now highly residential, conservation area.</p> <p>There is a clear conflict between the different classifications which the Proposals Map and relevant proposed policies say regarding the podium site: as a Major Development Opportunity (implying that development on this open space is acceptable), a site for office regeneration (when there are no offices currently on the site), an area suitable for 'cluster location' of high buildings, a Conservation Area, a Parks Regeneration Area, a Visitor Management Area, plus being next to a significant residential area. The ambiguity of the disputed policy/MDO/proposal map, might</p>	<p>To provide for the 9 million tourists visiting the South Bank every year, Waterloo's 40,000 workers and over 5,000 residents, the open space and the amenity of the Shell podium site should be protected and enhanced, solely as a Park Regeneration Area. The space should be shown as open to the public - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high buildings classification. There should be more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.</p>	<p>Accepted in part – The Shell podium site is now considered by the Council to be public open space and MDO 115 has been amended to reflect this. Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
				<p>lead to justification of development on the podium site, which would be contrary to other policies contained in the Draft :</p>		
				<p>POLICY 7 Protection of Residential Amenity</p>		
				<p>POLICY 37 High Buildings and Views. Any building on the podium site would: a. harm the character of the conservation area b. obstruct views to the London Eye as an "other view" while at the same time the podium site appears to be included in an area identified as suitable for a cluster location of high buildings.</p>		
				<p>POLICY 38 River Thames, Protection, Use and Access</p>		
				<p>POLICY 42, with particular reference to clause (F). The podium is an open, landscaped area within a conservation area, the loss of which should be resisted, since it forms an integral part of the character and appearance of the area, and provides a setting for several landmark buildings.</p>		
				<p>POLICY 44 Metropolitan Open Land. The open character of Jubilee Gardens would be compromised.</p>		
				<p>POLICY 45 Protection and Enhancement of Open Space and Sports Facilities. Parks Regeneration Areas, including part of the podium site, are categorised as public open space, regardless of ownership, and as such protected from development and erosion.</p>		
				<p>POLICY 75 Urban Design and Character of Waterloo which includes commitment to a high quality public realm, 'breaking down the superstructure which blocks off the river', and a place with a flourishing, cohesive and inclusive residential community.</p>		

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Proposals Map	London Cycling Campaign	2231	5085	Failure to provide a safe cycle route along the South Bank of the Thames.	Segregating Cycles and Pedestrians, widening the tunnels under the bridges.	Not accepted the provision of a cycling route within the borough goes beyond the scope of the UDP.
Proposals Map	Mr D Gallina	2235	5091	Local distributor would mean very heavy traffic on a narrow residential road which is already very busy, especially with the traffic from two local schools.	To remain a local access road.	Not accepted -Road designations are determined by Transport for London along with the Council's highway department. They are provided for information only on the Proposals Map and as such the UDP review is not the procedure to use in order to seek to change this designation.
Miscellaneous	Lambeth Cyclists	1722	2712	Developments to be only accessible by users coming by sustainable forms of transport, that is pedestrians, cyclists and public transport users. This is in line with Lambeth's Local Implementation Plan policy to reduce use of the Private Motor Car and increase the number of cyclists.	New policy to be inserted requiring developers to consult sustainable transport groups as well as civic societies about their application for development.	Not accepted. It is beyond the scope of the UDP to require developers to consult certain groups about their applications. No change proposed.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Miscellaneous	Chair Crime Working Group - Brixton Area Forum	1780	3266	<p>I am writing as Chair of the Crime Working Group of the Brixton Area Forum to express our concern that greater consideration has not been given to issues of crime prevention and reduction in the deposit UDP. Given that crime, and the fear of crime, is of primary concern to those people who live and work in Lambeth, I was surprised to see only one short paragraph (4.15.8) dedicated to the issue. I feel that the deposit UDP does not give due weight to the statutory duties imposed upon councils and the police to work together under Section 17 of the Crime & Disorder Act 1998.</p> <p>It is our opinion that every policy document produced by LBL, and in particular one like this which will have an effect of the quality of life for those living and working in the borough for a significant length of time, should include measures and guidelines aimed at preventing and reducing crime. These should be defined following consultation with the community and also with experts in the field. I understand that a police officer with training as a Crime Prevention Design Adviser and attached to LBL's Crime Unit made 6 appointments with the Planning Department to discuss a way forward, all of which were cancelled.</p> <p>I hope that these concerns will be addressed prior to publication of the revised edition, and that appropriate consultation will take place on these issues.</p>	<p>The Crime Working Group would like to see a policy dedicated to the prevention and reduction of crime added to the UDP. This should apply not only to new developments, but also to refurbishments and changes of use, as well as to the improvement of existing buildings, neighbourhoods and spaces. All developments should be required to comply with the guidelines of the 'Secure By Design' programme.</p>	<p>Policy 31 already sets out the requirements for new developments in this regard. A new policy (Policy 31a) is also proposed to address this issue directly.</p>
Miscellaneous	Julie Nunn	1837	3685	<p>The plan is extremely complex and constantly cross-references to another sections.</p>		<p>Not accepted. The plan has been written clearly and cross-referencing has been deliberately avoided throughout the plan.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
Miscellaneous	Lambeth Liberal Democrat Group	1975	4513	<p>If we take as a starting point that Lambeth's new Deposit UDP should be an improvement over the old UDP, we in the Liberal Democrat Group have concerns that this fails in a number of areas.</p> <p>Firstly it is not 'user friendly' as it is more difficult to dip in and out of when looking for specific policies. It is cluttered and the reader has to wade through narrative sections which far from making things clearer simply add to the confusion. These narrative sections contain language which, arguably, have no place in a UDP .</p> <p>The layout and printing, while undoubtedly 'modern', are not clearly legible to anyone with less than 20/20 vision. The Proposals Map needs to be redrawn, corrected, and made much clearer .</p> <p>The document has the appearance of being rushed, not adequately proof read, contains errors almost too numerous to mention, and is a wholly inadequate basis on which to progress such an important borough-wide planning strategy to the year 2017.</p> <p>The Liberal Democrat Group is further concerned that the whole consultation process and time-frame has been inadequate, .both for us as a group to discuss at length, and for members of the public.</p> <p>Specifically, the UDP Review Panel had insufficient time to raise initial concerns. At the first meeting, some members of the panel saw the Deposit UDP for the first time -not a good basis on which to review a complex document. The Liberal Democrat representative requested that officers should prepare a brief to show departures from the existing UDP but this was not done until later in the process and then not thoroughly.</p> <p>There was much greater emphasis on completing to a wholly arbitrary timetable than on detailed discussion and scrutiny of the draft</p>		<p>Noted but not accepted. The majority of these objections relate to aesthetic aspects of the plan (layout, printing, proposals map, typographical errors) which will all be corrected in the final version of the plan. In relation to the design of new developments, this is covered in Policy 32.</p>

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

UDP . Members were (falsely) assured that more time would be available for objections in the public consultation stage.

Whilst great play was made by the administration that consultation was widespread during the public consultation stage, a number of interested parties, residents groups and amenity societies felt unconsulted.

Various public consultation events and workshops were held, but in our view these should have been carried out prior to the six week period of public consultation commencing. Many people attending these were hearing about the consultation process for the first time. These residents were thus disenfranchised, as they had a lesser time to take part in the consultation period -some had only half the statutory period to respond -even though they had clearly shown interest in the process by attending a public meeting.

The liberal Democrat Group also expressed concern that a week into the six week period of public consultation, copies of the Deposit UDP had not been deposited in half of Lambeth's public libraries. Where they were available they appeared to be 'under-the counter' as if to suggest they were somehow pornographic in content.

Nowhere in Lambeth's libraries were there any display boards explaining the public consultation process then under way. This seems calculated to minimise objections and certainly does not attune with our idea of encouraging public involvement in local issues centred around the built and natural environment.

Finally, there were problems with Lambeth's web-site which had been advertised by the Council as a means of accessing (in an easy and modern way) the Deposit UDP. Specifically, it appears, that for some time during the public consultation period, the web-site crashed when people tried to download sections.

Paragraph:	Respondent:	Respondent Reference:	Representation Reference:	Respondent Reasons:	Changes Required by Respondent :	Council's Response:
------------	-------------	-----------------------	---------------------------	---------------------	----------------------------------	---------------------

If the Deposit Lambeth UDP is to carry any real weight it must relate to the needs of Lambeth, needs which are often complex and occasionally contradictory

Recently, at planning committee, there has been a tendency for new Government guidelines on increased densities to become an overarching policy to the detriment of other specific policies in Lambeth's UDP.

Whilst the Lambeth Liberal Democrat Group supports the good intentions of higher density in urban areas as a two-pronged attack on homelessness in London whilst preventing urban sprawl into the Green Belt, proper weight must be placed on other considerations such as design, suitability to the local vernacular, distance between buildings, private or public amenity space etc.

The Lambeth Liberal Democrat Group believes that the Planning Department and Planning Committee have a duty, and indeed must be encouraged, to drive-up standards of design in both the private and public sectors on all new developments within the borough. Merely being within the density requirements is not enough. Further, in design terms, the Liberal Democrat Group wishes to see an end to the wholly arbitrary and divisive distinction between development in the public and private sector and an encouragement to private developers to incorporate public realm amenity space