

**From:** [REDACTED]  
**To:** [s106-cil](#)  
**Subject:** Lambeth CIL Draft Charging Schedule - Coin Street Community Builders Views  
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Please see below Coin Street Community Builders views on Lambeth's CIL Draft Charging Schedule, along with Policies EN1, D3, D4 and S2 and the Infrastructure Delivery Plan:

### **CIL Charging Schedule**

CSCB wishes to emphasise the importance of providing accommodation enabling older people in north Lambeth and north Southwark to remain near their friends and community when they need longer-term nursing care. Care is paid for by individual savings or by the state. Given land values in the area and the proposed CIL charge, the costs to an individual will be extremely high and affordable provision will be unlikely to be provided.

It is acknowledged that the proposed CIL rate for self-contained extra care homes is half of the CIL residential rate for each charging zone but this does not focus on the issue. From this basis, CSCB continues to object to the proposal to introduce a CIL charge on nursing homes in this area.

### **Policies EN1, D3, D4 and S2 and the Infrastructure Delivery Plan**

We note and support the comments in the above policies that in order to support growth in the borough, the council will safeguard and improve essential social, physical and green infrastructure and work in partnership with service providers to ensure the delivery of the additional infrastructure. Similarly for the comments that the council, where required and necessary, will co-produce co-operative local investment plans and local neighbourhood infrastructure delivery plans that identify, prioritise and cost projects to be delivered locally via agencies working in co-operation with the council or by the council itself; and that projects will be brought forward as appropriate and relevant in mitigating the direct impact of development through section 106 planning obligations or the council will retain funds on behalf of the community to deliver local neighbourhood facilities and improvements through the use of a neighbourhood funding element of CIL.

However, we are concerned that the Infrastructure Delivery Plan does not target and prioritise the right investment in the right projects and the right areas. Firstly, this is in order to support mixed communities (which are referred to as being supported in para 2.119, Strategic Objective E14, Policy D1 d, Policy H2 etc), particularly in the context of high land values in the north of the Borough, investment is required in the neighbourhood and in the community and we are concerned that the proceeds of development are being taken out of the local community, not re-invested in it. Secondly, this is in having regard to the overarching objectives, aims and commitments made in the Local Plan. For example, paragraphs 11.11, 11.12, 11.16, 11.17 and policies PN1, S2, D3 and D4 refer to the need to support walking, cycling, air quality, green space, public realm and social infrastructure but the same priorities are not carried through into the Infrastructure Delivery Plan's schemes and commitments to delivery priorities.

The Plan needs to establish a clear link between expected developments, the CIL they generate, and what this CIL is used to fund. In the case of Waterloo and South Bank this means investing substantially more in the neighbourhood rather than simply extracting resources. This also includes a far higher investment in management and maintenance of the South Bank.

For example, the Coin Street estate includes Bernie Spain Gardens and the riverside walkway from the National Theatre to Sea Containers House. CSCB is responsible for the management and maintenance of this large and very heavily used area of South Bank public realm. Proposals for the re-landscaping of Bernie Spain Gardens north and the area between the riverside walkway and the former London Television Centre, including new paths, CCTV and lighting, and a bridge connection between the re-landscaped Gardens and Oxo courtyard received planning permission on 7<sup>th</sup> April 2019 (under ref. 19/00087/FUL).

The project responds to Strategic Objective 11 - 'Increase the quality of open space and multi-functional green infrastructure in Lambeth' and is a consequence of the intensity of use caused by continued major growth in Waterloo, South Bank and Bankside. Paragraphs 2.108 and 2.113 of the draft Local Plan refers to intense pressures on infrastructure over the next 15 years to support projected population and economic growth. Parks and open spaces are included in the infrastructure to be provided. Policy PN1 lists the neighbourhood's key roles and paragraph (g) seeks to promote "a high quality, permeable, safe and accessible public realm that is durable, well-designed and maintained to reinforce Waterloo's status as a world class place... Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events, and actively contribute to the enhancement of the collective public realm and increase the amount of green infrastructure in the area."

Bernie Spain Gardens is listed in Annex 6 as a 'District & Local Open Space' and will undoubtedly serve the growing working, visitor, student, and resident populations. CSCB wishes to see a commitment in the Local Plan to supporting Bernie Spain Gardens to become the high quality public realm and green space fundamental to the growth envisaged for the neighbourhood in the draft Local Plan.

It is not at all clear why the 'Waterloo City Hub' has been prioritised for CIL investment in the Infrastructure Delivery Plan. It is not popular locally and now appears to be identified as a site for a tall development in Annex 11. There is absolutely no point in committing resources to this project if a developer is going to construct a large building on it.

Conversely, there is a growing recognition that provision for youth has been neglected and that a holistic approach to knife crime and gangs is required. CSCB believes that a significant youth facility, cross-subsidised by commercial income, should be identified in the Infrastructure Delivery Plan.

We therefore conclude that the plan is currently **unsound** by not being positively prepared, justified, effective or consistent with national policy.

The plan needs to be amended to include a programme of schemes and priorities that match with the spatial areas for greatest development and the overarching objectives and aims of the plan. These need to include prioritised investment in the provision of walking and cycling routes, public realm and greenspaces in the South Bank area together with management and maintenance, youth facilities and social infrastructure. Schemes to deliver support for the private

car should not be prioritised, together with schemes that are not supported locally.

Kind regards

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Director

**Tel (DDI):** 0208 138 5837

**Tel (mob):** ██████████

**Email:** ██████████@carneysweeney.co.uk

**Address:** 77 Farringdon Road, London, EC1M 3JU

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