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To: [Local Plan](#)
Subject: Proposed Main Modifications to the Draft Revised Lambeth Local Plan 2020 - comments by Jubilee Gardens Trust
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To Lambeth Planning Policy

Representations by Jubilee Gardens Trust on Proposed Main Modifications to the Draft Revised Lambeth Local Plan 2020

The Jubilee Gardens Trust is grateful for the opportunity to comment on the Main Modifications to the DRLLP 2020. Its comments are as follows:

1. The Trust welcomes and supports the proposed additional words in Policy PN1(h) – as shown in the yellow highlight below:

Management, Maintenance and servicing requirements (including for sustainable watering) should be planned and designed from the outset. Supporting infrastructure and Servicing arrangements should not harm the openness of the MOL and should address Local Plan policy EN1(a)(iii). There should continue to be provision of public toilets in Jubilee Gardens. Where it is demonstrated that major developments in the vicinity of Jubilee Gardens and its extension will result in a significant increase in visitor numbers to the open space, planning obligations will be sought to mitigate the impact on management and maintenance of the Gardens.

2. However, for the reasons set out at 3 below, the Trust would also wish to see further additional words as follows
 - a. Policy PN1 h) 1st para - add words as shown underlined below:

Development at Hungerford car park can take place on the remaining one third if this promotes the expansion of the arts and cultural activities of Waterloo and allows for the extension of Jubilee Gardens on the protected two thirds. An element of enabling development on the one third may be acceptable, to support the delivery of the main arts and cultural uses and the management and maintenance of the Jubilee Gardens extension. As with all development, any harmful impacts must be mitigated in accordance with the statutory tests for planning obligations.
 - b. Policy PN1 (h) Add further wording to final paragraph as shown underlined below:

Management, maintenance and servicing requirements (including for sustainable watering) should be planned and designed from the outset. Supporting infrastructure and servicing arrangements should not harm the openness of the MOL and should address Local Plan policy EN1(a)(iii). Within these constraints the Council will support the provision of infrastructure for the generation of revenue to contribute to funding the management and maintenance of the Gardens (including the extension) to the highest standards. There should continue to be provision of public toilets in Jubilee Gardens. Where it is demonstrated that major developments in the vicinity of Jubilee Gardens and its extension will result in a significant increase in visitor numbers to the open space, planning obligations will be sought to mitigate the impact on management and maintenance of the Gardens.

3. The grounds on which the Trust seeks the additional changes suggested above are as follows:

3.1 Proposed amendment (a) to Para 1 of Policy PN1 (h):

As set out in the extract above, built development on Hungerford Car Park is acceptable if it 'promotes the expansion of the arts and cultural activities of Waterloo **and allows for the extension of Jubilee Gardens on the protected two thirds.**' (our emphasis). The Council has always rightly seen the redevelopment of Hungerford Car Park as a whole, linking the built development on the one-third of non-MOL land and the extension of the Gardens on the other two-thirds. It is possible that a development will take place which does not have a significant impact on the Gardens and does not thus justify a s106 contribution. To cater for this, the Plan should leave open the possibility that the Gardens would also benefit from the enabling nature of the development envisaged in the Plan. As set out further in 3.3 below, to allow for the extension of Jubilee Gardens also requires that adequate funding is available to maintain the extension, and if it is to be maintained by the Trust, that the Trust is sufficiently financially secure to take on the additional responsibility.

3.2 Proposed additional amendment (b) to Para 4 of Policy PN1 (h):

Although the amendment relating to planning obligations is welcome, this approach, despite strong representations by the Trust, was reflected only on a very limited basis in the s106 agreement for Elizabeth House. The agreement contains only a one-off contribution of £50,000 which will not mitigate the long-term impact of over 9,000 additional employees in the vicinity. For comparison, the impact of the Southbank Place development, with only 3,000 additional employees, was mitigated by an annual contribution of £60,000 for ten years. It may well be that there are few future developments as close or of such a scale as Elizabeth House. The intent of the additional wording may therefore not be realised in practice and may not produce the level of resources needed for the Trust to be confident of its financial ability to manage the extended Gardens. To address this, Trustees are keen themselves to generate as much revenue as possible on the extension area where the covenant precluding commercial activities does not apply, naturally be within the constraints of MOL. The amendment we seek is to secure an expression of the Council's support for the infrastructure for such revenue-generating activities within the applicable constraints.

3. In relation to both amendments:

The Trust's current forecasts suggest a high risk of a shortfall in its resources to maintain the extended Jubilee Gardens into the long-term future, although it is the Plan's assumption that the Trust will be responsible for the maintenance of the extension. Income is constrained by the legal covenant preventing commercial activity on the existing Gardens, but the forecasts also recognise the progressive loss of existing s106 support as set out in the Trust's evidence to the EIP, further exacerbated by a reduction in the contribution from the London Eye s106 as a result of Covid 19. If the Trust is not adequately resourced to assume the additional responsibility of the extended Gardens, the Gardens extension, a key objective of the Plan, is at risk of being frustrated. If the Trust fails there will be a severe threat to the quality future success of the whole area.

We would be grateful for acknowledgement of the receipt of these representations.

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