

**Carmel Edwards  
Programme Officer**

By email: [programmeofficer@carmeledwards.com](mailto:programmeofficer@carmeledwards.com)

9 October 2020

Dear Carmel,

**EXAMINATION OF DRAFT REVISED LAMBETH LOCAL PLAN 2020 - 2035  
MATTER 2: SPATIAL STRATEGY, VISION AND OBJECTIVES**

**Introduction**

South Bank Employers' Group (SBEG) is pleased to make the following representations in respect of the Examination of the draft revised Lambeth Local Plan. SBEG was formed in 1991 as a not for profit company to represent the collective ambition of the main employers - businesses, cultural and arts organisations, social enterprises, statutory agencies, public institutions and infrastructure providers that work and operate in the South Bank and Waterloo area. Following 30 years of success in transforming the area, the ongoing commitment to SBEG reflects our members' desire to see South Bank remain as one of the most culturally and economically dynamic parts of London and the UK.

SBEG brings together a diverse group to achieve a shared vision - one that is based on collaboration, joint working and a firm commitment to those issues that matter to the local business and residential community - a quality public realm and environment, social amenities and facilities, and access to jobs, skills and training opportunities for residents of Lambeth and Southwark.

SBEG members are internationally preeminent in their respective fields, and span the worlds of culture, property, tourism, hospitality, transport, education, health, commerce and community. Members are vital to the very fabric of Lambeth's identity, and to the day to day life of its many communities. Our members are also critical to Lambeth's economic prosperity, and to the borough's future success.

**Main Matter 2: Spatial Strategy, Vision and Objectives**

In the Inspector's Matters, Issues and Questions (MIQ) Discussion Note (Revised at 30 September 2020), the following are set out under Matter 2: Spatial Strategy, Vision and Objectives:

*2.1 (ii) Should the Plan set out and address the London Plan's Opportunity Areas (OAs), at Vauxhall/Nine Elms/Battersea and at Waterloo and reflect the indicative targets, for 18,500 new homes and 18,000 new jobs at Vauxhall/Nine Elms/Battersea and 6,000 new jobs at Waterloo?*

*2.1 (iii) Should the Plan provide a clear articulation of its relationship with the Central Activities Zone, including its relationship within the Central Services Area?*

*2.1 (iv) Are the vision and objectives sufficiently comprehensive to set a sound framework for the Plan, or are there significant gaps or flaws?*

In our original submission to the draft plan, made in December 2018, we made the following points:

- The need for a clear vision for the area - one that draws on South Bank's inherent identity, its many strengths and attributes, and the factors that have made it a model of successful urban regeneration and transformation, and one that has been adopted by other neighbourhoods and districts across London and in other cities.
- Given the growth agenda for Waterloo and South Bank, the need for explicit recognition of the pressures on the neighbourhood, its infrastructure - including its parks and green spaces, and the resulting experience for visitors, employees, residents and students.

The South Bank neighbourhood has faced intense pressure for many years and the delivery of major development projects will only intensify this dynamic. The need for increased and sustain investment in the area is not referenced in the draft plan.

SBEG is clear as to the significance and importance of South Bank: as the cultural heart of London; one of the city's leading destinations for visitors; a hub for the creative and digital industries; a successful business district, with a number of key economic clusters underpinned by exceptionally strong partnerships with the area's education and learning organisations; and home to a world-leading teaching hospital, and Europe's busiest transport interchange.

Given its many strengths, we are also clear that the area's future success will be dependent on the continuation of many of the dynamics that have created the South Bank of today: continued investment by operators, landowners and developers; attracting and securing additional external investment, and the related need to support the area's infrastructure, green spaces and public realm.

And any vision for the area should recognise that South Bank is a community - a real place, with a growing residential and student community, and an associated need for a range of community facilities and services, especially for young people, and the elderly.

We also need to ensure that all aspects of urban management - cleaning, refuse and waste management, security, construction management, accessibility and orientation, maintenance and the built and green environment, pedestrians and traffic - receive the necessary levels of resource, in the context of continued growth.

SBEG is supportive of the statements made under Policy PN1 relating to South Bank's role in the central London economy as:

- an international centre for culture and the arts as part of the London Plan Southbank / Bankside Strategic Cultural Area
- a pre-eminent international, domestic, and local tourist, leisure, retail and entertainment area
- a major location for offices, healthcare and high education
- a mixed residential area with appropriate supporting community, service and shopping facilities
- having a valued historic character
- being one of London's most important transport hubs

The Local Plan should give a clear and positive commitment to the cultural, arts and creative industries in the South Bank and Waterloo area, in line with the new London Plan, and the Mayor's Culture Strategy and the London-wide Cultural Infrastructure Plan. The new London Plan seeks to prioritise the contribution of culture to London and emphasises the need for all boroughs to plan positively for culture and the creative industries.

The Local Plan should not only reflect these commitments but should promote specific policies aimed at supporting the cultural vibrancy and dynamism of the South Bank neighbourhood. This is not only to maintain the status quo of the South Bank's status and reputation, but also in acknowledging the economic necessity of ensuring that the area remains competitive as other parts of London invest in, and promote their cultural offer - whether East Bank and the Olympic Park, Bankside, the City and its Cultural Mile, Croydon, Westminster - especially North Bank and Victoria, and other regeneration areas like Wembley Park.

The Plan should also contain a statement that reflects the shared ambitions and joint vision for the Westminster Bridge Campus, transforming this part of South Bank into a "Med Tech" cluster of global significance.

Whilst we comment separately on Matter 9: Places and Neighbourhoods (Policy PN1 - Waterloo and South Bank) we feel that the above comments are relevant to Matter 2 as follows:

*2.1 (ii) Should the Plan set out and address the London Plan's Opportunity Areas (OAs), at Vauxhall/Nine Elms/Battersea and at Waterloo and reflect the indicative targets, for 18,500 new homes and 18,000 new jobs at Vauxhall/Nine Elms/Battersea and 6,000 new jobs at Waterloo?*

Yes, we believe that the Local Plan should address these issues under **Spatial Strategy, Vision and Objectives**.

*2.1 (iii) Should the Plan provide a clear articulation of its relationship with the Central Activities Zone, including its relationship within the Central Services Area?*

Yes, we believe that the Plan should set out and provide a clear articulation of the relationship to the Central Activities Zone under **Spatial Strategy, Vision and Objectives**. The South Bank and Waterloo area's inclusion with the Central Activities Zone is an important dynamic in terms of its functions, use and investment needs. This should be more clearly referenced and acknowledged in this section of the Plan.

*2.1 (iv) Are the vision and objectives sufficiently comprehensive to set a sound framework for the Plan, or are there significant gaps or flaws?*

Yes, in line with the above, we feel that the lack of clear statements re 2.1 (ii) and 2.1 (iii) represents a gap which needs to be addressed.

I trust that these comments are helpful, and I look forward to discussing them further at the Examination.

Yours sincerely



**Nic Durston**  
**Chief Executive**