

**Carmel Edwards**  
**Programme Officer**

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9 October 2020

Dear Carmel,

**EXAMINATION OF DRAFT REVISED LAMBETH LOCAL PLAN 2020 - 2035**  
**MAIN MATTER 7: ENVIRONMENT AND GREEN INFRASTRUCTURE**

**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 7: ENVIRONMENT AND GREEN INFRASTRUCTURE**

In the Inspector's Matters, Issues and Questions (MIQ) Discussion Note (Revised at 30 September 2020), the following is asked under Matter 7: Environment and Green Infrastructure:

*7.1 Open space, green infrastructure and biodiversity: (i) Should policy EN1(open space, green infrastructure and biodiversity) be less of a blanket policy on open space protection and show flexibility by taking into account whether the open space being lost is truly accessible space and in active use? (ii) Should the policy also include an additional criterion covering where the benefits of the alternative proposal outweigh the disbenefits of the loss of the open space, in recognition of the improved quality of provision? (iii) Should there be more flexibility in relation to urban greening requirements for major developments, which may be on constrained industrial sites?*

*7.2 Decentralised energy, design and construction: Is policy EN3 (decentralised energy) justified and in accordance with national policy and the London Plan? Is it appropriate for the policy to specify specific technologies as a requirement?*

*7.3 Sustainable drainage systems, water management and flood risk: Are policies EN5 (flood risk) and EN6 (sustainable drainage systems and water management) justified and consistent with national policy?*

*7.4 Sustainable waste management: It would appear from GLA's comments that policy EN7 (sustainable waste management) needs further clarification in relation to the proposed approach to net self-sufficiency. The gap in waste capacity is put by the GLA at 143,000 tonnes up to 2021 and 152,000 tonnes by 2041. Does the Plan therefore need to set out how much of the capacity gap could be met through the intensification of existing waste sites and how much would be exported to other Boroughs?*

We wish to comment on 7.2. Please note that we have commented separately on Matter 2: Spatial Strategy, Vision and Objectives, on Matter 8: Quality of the Built Environment, and on Matter 9: Places and Neighbourhoods (Policy PN1 - Waterloo and South Bank).

We support Policy EN3, and specifically the statements in the supporting text as follows:

*9.23: Major development proposals that cannot immediately connect to an existing heating or cooling network should evaluate the feasibility of CHP other systems as per the London Plan heating hierarchy. Zero emission systems are encouraged. Where a new CHP system is appropriate and there is no planned future network in the vicinity of the site, the feasibility of extending the system beyond the site boundary to adjacent sites to create a district heating network should be examined. Where such a possibility exists, this should be discussed with the council and where considered appropriate, the development will be encouraged to extend the heat network to the site border and potentially beyond and/or a financial contribution may be sought towards the development of that district heating network.*

*9.24. In 2010 a Lambeth borough-wide Heat Map Study was completed to help identify decentralised energy opportunities in the borough. The results of the study have been fed into the London Heat Map, (and) the Heat Network Priority Areas, and this tool should be used by applicants as a starting point to identify opportunities for decentralised energy. In Vauxhall, reference should also be made to the Vauxhall, Nine Elms and Battersea Opportunity Area Energy Masterplan. In Waterloo, reference should also be made to the emerging development of a South Bank Decentralised Energy Network. In addition, applicants should have regard to:*

- *Vauxhall - Nine Elms Vauxhall Opportunity Area Energy Masterplan (November 2012)*
- *South Bank Decentralised Energy Feasibility Report (February 2019)*

SBEG continues to work with Lambeth Council, the GLA and local landowners on the provision of a South Bank decentralised energy network.

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

Yours sincerely



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