

**Carmel Edwards  
Programme Officer**

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9 October 2020

Dear Carmel,

**EXAMINATION OF DRAFT REVISED LAMBETH LOCAL PLAN 2020 - 2035  
MATTER 8: QUALITY OF THE BUILT ENVIRONMENT**

**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.

**Matter 8: Quality of the Built Environment**

In the Inspector's Matters, Issues and Questions (MIQ) Discussion Note (Revised at 30 September 2020), the following is asked under Matter 8: Quality of the Built Environment.

*8.1 Quality of urban design, public realm, construction detailing, alterations and extension and living conditions: (i) Are policies Q1-Q24 justified, effective and consistent with national policy? (ii) Do these policies take sufficient account of the need to safeguard the living conditions of both existing neighbouring occupiers and future occupiers of new development?*

We have commented separately on: Matter 2 - Spatial Strategy, Vision and Objectives; Matter 7 - Environment and Green Infrastructure; and Matter 9 - Places and Neighbourhoods (Policy PN1 - Waterloo and South Bank). We make the following additional comments, with reference to the submission that we made via previous representations, reference R072.

Policy Q6 Urban design: public realm contains several statements as supporting text, and paragraph 10.26 states that:

*“Streetscape/urban design guidance has been prepared for some parts of the borough. This includes guidance for Waterloo (by the South Bank Employers’ Group) and the Nine Elms on the South Bank Public Realm Design Guide and the Waterloo and South Bank Public Realm Framework Vauxhall streetscape guidance for Vauxhall. Any such area-specific guidance, where it has been agreed by the Council, should inform design development in these areas.”*

For the Local Plan to be justified, it needs to: be based on appropriate strategies; account for reasonable alternatives; and be based on proportionate evidence. The draft Waterloo and South Bank Public Realm Framework was met with objections from several local organisations, including SBEG, South Bank Business Improvement District, We Are Waterloo Business Improvement District, Bankside Open Spaces Trust, Jubilee Gardens Trust, Oasis, South Bank and Waterloo Neighbours, and Waterloo Community Development Group - who worked together to submit a unified statement objecting to many aspect of the draft Framework.

COVID-19 has shown the importance of local green and open space to the communities in South Bank and Waterloo, where only 27% of all homes have access to a private garden (compared to 88% in England, and 75% in Lambeth) and where only 21% of flats have access to private space (compared to 65% in England and 68% in Lambeth<sup>1</sup>). This is recognised in the South Bank and Waterloo Recovery Plan (July 2020) which has been agreed by all members of South Bank and Waterloo Partnership, including Lambeth Council. A copy of the Recovery Plan is included with this submission.

We recommend that Policy Q6 be reviewed in the light of the COVID-19 pandemic, and the priorities and objectives of the South Bank and Waterloo Recovery Plan of July 2020. Furthermore, the South Bank and Waterloo Neighbourhood Plan has been now been “made” following the residential and business referenda in October 2019. The Plan’s projects list has been updated to reflect the priority given to green space in the Plan and identifies the need for contributions to revenue and capital to support green infrastructure needs, especially in terms of development, and ongoing management and maintenance.

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

Yours sincerely



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

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<sup>1</sup> Centre for Cities data (<https://www.citymetric.com/fabric/covid-19-highlighting-cities-unequal-access-green-space-5168>).