Matter 9 – Places and Neighbourhoods

Are the following policies positively prepared, justified, effective and consistent with national policy?

PN1 – PN11 reflect the aspirations and approach for eleven different parts of the borough, within the strategic framework set by the London Plan and the borough-wide policies in the Local Plan. The PN policies have been reviewed and updated to be consistent with national policy, the London Plan, up to date evidence and local community aspirations, including those expressed in both made and emerging neighbourhood plans. Where town centres are cross-border, the PN policies reflect cross-border working. An illustrative spatial representation of the aspirations for each PN area is shown on the maps accompanying each PN policy (with precise policy designations shown on the Policies Map). Annex 12 of the Local Plan identifies which parts of the PN policies are strategic and which are non-strategic, in accordance with paragraph 21 of the NPPF.

The PN policies have been informed by extensive engagement with representatives of local communities and businesses throughout the preparation of the Plan. This included a separate meeting with each designated and emerging neighbourhood forum, and with the Loughborough Junction Action Group/Forum, in October and November 2017 (see section 3.14 of the Issues consultation report (SD15), a workshop with local businesses and stakeholders in Streatham in November 2017 (see section 3.14 of the Issues consultation report (SD15) and section 3 of Topic Paper 4: Town Centres (TP04), a presentation to the Norwood Action Group/Norwood Planning Assembly in November 2018 (see Draft Revised Lambeth Local Plan consultation report (SD16a), a further meeting with Loughborough Junction Action Group and Loughborough Junction Neighbourhood Forum in September 2019, and a presentation to the South Bank Forum in February 2020.

See also section 3 of <u>Topic Paper 4: Town Centres (TP04)</u>. Full consideration was given to the representations received during each round of consultation to inform both the supporting text and policy wording. See section 11 of the (<u>see Draft Revised Lambeth Local Plan consultation report (SD16a</u>); and Appendix 1 of this document, which sets out point by point how the Loughborough Junction Neighbourhood Forum's Regulation 18 comments were reflected in Policy PN10 of the DRLLP PSV 2020 (the Plan).

Each policy is preceded by an introductory section which provides a summary of the characteristics and challenges for the area, referring where relevant to locally-specific studies and masterplans that have informed the approach, as well as input from neighbourhood planning forums and groups. A consistent approach has been followed for the structure of each introductory section to provide the following information:

 Context and character: an overview of the key features of the area, such as the population of the area, any London Plan designations and targets, areas of strategic regeneration, housing types and heritage assets (including heritage assets at risk).

- Community: an overview of the key stakeholders for the area, the status of any neighbourhood plans and community and cultural assets.
- Housing: this section clearly signals the housing growth potential for each Places and Neighbourhood. This includes the housing growth potential for town centres (where identified in Annex 1 of the London Plan) and the wider area, based on the evidence and policy approach within the Local Plan as a whole.
- Economy and culture: an overview of key features and challenges for the local economy of each area, in terms of town centre and cultural uses, job types and the evening and night-time economy classifications, and industrial land. This section clearly signals the commercial growth potential for town centres (where identified in Annex 1 of the London Plan) and wider area, based on the evidence and policy approach within the Local Plan as a whole.
- Transport and public realm: an overview of public transport, walking and cycling infrastructure for each area and capacity and accessibility issues to be addressed in line with <u>Lambeth Transport Strategy and Healthy</u> <u>Network (EB43)</u> and the <u>Lambeth Infrastructure Delivery Plan (EB99)</u>.
- Environment: an overview of environmental and sustainability issues for each area, including air quality focus areas, areas of open space deficiency, flood risk and potential for decentralised energy.

The site allocations that remain relevant have been carried forward from the Lambeth Local Plan 2015 and will be updated or reviewed where necessary through the forthcoming Site Allocations Development Plan Document (SADPD). For this reason, no changes have been made to the site allocations within the submitted Plan. Representations relating to the existing site allocations will inform the preparation of the SADPD.

Further information about each of the PN policies is provided below.

9.1 Policy PN1 (Waterloo and South Bank): including the proposals for Sites 5 (Elizabeth House, York Road, SE1), Site 6 (Shell Centre, York Road, SE1) and Site 9 (ITV Centre and Gabriel's Wharf, Upper Ground Street, SE1).

PN1 sets out the vision for Waterloo and South Bank as a thriving and competitive area, playing a key role in the central London and Lambeth economy and its various roles as a CAZ retail cluster; a location for specialist and independent retail as part of the Lower Marsh/ The Cut/ Leake Street Special Policy Area; an international centre for culture and arts as part of the London Plan South Bank/Bankside Strategic Cultural Area; a pre-eminent international, domestic and local tourist, leisure, retail and entertainment area; a major location for offices, creative and digital industries, healthcare, MedTech and life

sciences businesses and higher education; a mixed residential area with appropriate supporting community, service and shopping facilities; having a valued historic character; and one of London's most important transport hubs will be supported and enhanced.

PN1 (a) to (f) sets out a positive, justified and effective strategy to balance the competing priorities for the area and to achieve this vision, including how new development will contribute to the London Plan targets for new homes and jobs in the Opportunity Area and to the residential and commercial growth potential identified in the London Plan, in accordance with London Plan policy SD1. The policy recognises that affordable housing remains a priority for the area and seeks to secure benefits for the long-standing residential community through the application of affordable housing and affordable workspace policies and securing planning obligations for local training and employment. See also Proposed Change PC090 of <u>SD17a</u>. The supporting text to PN1 acknowledges that the eastern area of Waterloo offers development opportunities for appropriate uses, including housing and refers to some of the sites in the planning pipeline that will deliver housing. The approach to visitor accommodation in Waterloo has also taken account of long-standing concerns about the impact on the residential community. See paragraphs 4.15 – 4.20 of Topic Paper 5: Visitor accommodation (TP05).

The policy recognises the importance of the area, particularly for the residential community, as a location for specialist and independent retail and sets out a positive strategy for the CAZ retail cluster and Lower Marsh/The Cut/Leake Street Special Policy Area in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8. The policy is consistent with the aspirations set out in the <u>South Bank and Waterloo Neighbourhood Plan (SD05)</u>. See paragraphs 2.6 – 2.20 of the <u>Topic Paper 4: Town Centres (TP04)</u> for further detail. Map 4 of the <u>Proposed Changes to the Policies Map (PD2)</u> shows the boundaries of these designations.

The policy supports the role of the area's existing cultural and community assets and its role as part of the Strategic Southbank/Bankside Cultural Quarter. This is in accordance with London Plan policy HC5 and paragraphs 91 and 92 of the NPPF. See also the <u>Cultural Infrastructure List in Lambeth (EB29)</u>. The policy also recognises the importance of the area's heritage assets in accordance with paragraphs 184, 185 and 186 of the NPPF. <u>See also Topic Paper 8: Tall buildings</u> for further detail on the approach to tall buildings.

The policy takes a positive, effective and justified approach to support the growth of the area as business district particularly for creative and digital industries, recognising the area's commercial growth potential and job targets for the Opportunity Area as identified in the London Plan. The type of office and workspace support is consistent with the aspirations set out in the <u>South Bank</u> and Waterloo Neighbourhood Plan (SD05) and will help meet the need identified in <u>Topic Paper 3</u>: Workspace (TP03). See the <u>Lambeth Creative and Digital</u> <u>Industries Strategy 2018 (EB25)</u> and <u>Lambeth Creative and Digital Industries</u> <u>Study 2017 (EB26)</u>. This is consistent with paragraphs 80, 81 and 82 of the NPPF.

The policy takes a positive, effective and justified approach to improving the area's public realm and increasing green infrastructure through new developments and improving existing green infrastructure in the area, recognising its importance for residents, visitors and workers, in accordance with paragraphs 91, 96 and 97 of the NPPF. This also reflects the aspirations of the <u>South Bank and Waterloo Neighbourhood Plan (SD05)</u>. See also Proposed Change PC093 of <u>SD17a</u>.

The policy sets out a positive, justified and effective approach to supporting the area's role as a strategic transport interchange and to support growth by working in partnership with TfL to deliver improvements to public transport infrastructure and the road network alongside improvements to walking and cycling in accordance with the Lambeth Transport Strategy and Healthy Routes Network (EB43) and an increased role of the River Thames. See also the Lambeth Infrastructure Delivery Plan (EB99). The policy supports improvements to reduce traffic and improve sustainability, air quality and green infrastructure. This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF and the aspirations for a network of Greenways set out in the South Bank and Waterloo Neighbourhood Plan (SD05). See also potential changes PC092 and PC096 proposed for clarification in the Schedule at SD17a.

The policy identifies the MedTech Health Cluster in recognition of the aspirations and strategies for St Thomas' Hospital, King's College and Guy's and St Thomas' Charity to develop a campus for MedTech, healthcare and life sciences cluster. In recognition of comments from the parties involved in the Royal Street development, the Council has suggested a potential change to the wording of PN1(m) - see PC097 in <u>SD17a</u>.

Although PN1 relates to Waterloo and South Bank, the council also wishes to work proactively with the King's College Hospital Foundation Trust on plans for their state. See potential change PC116 in <u>SD17a</u> which is proposed for the supporting text to PN10, given the location of the hospital in Denmark Hill close to Loughborough Junction (it spans the borough boundary with Southwark).

Jubilee Gardens/Hungerford car park

The proposal to amend the MOL boundary at Hungerford car park is explained on page 55 of the Proposed Changes to the Policies Map (PD02), and shown on the maps on pages 58 and 59 of that document. These is no loss of area of MOL and no change in the two thirds to one third ratio between MOL and developable area.

As explained in the justification for the boundary change on page 55 of PD02, there are many, complex planning constraints affecting the development of the one third of Jubilee Gardens. The site has remained undeveloped for several decades, in part owing to these difficulties. The Local Plan must take a policy approach that has regard to deliverability to achieve soundness. A previous proposed change to the MOL boundary consulted on at Regulation 18 received objections from the prospective developer of the site. The Council has therefore had regard to these concerns and the current proposal in the submitted Plan shows an area that has potential to be developed whilst also addressing the

various planning constraints. The adopted and previously proposed areas could not achieve this. The proposal is therefore positively prepared and is supported by the Southbank Centre, a key stakeholder in any future development proposals (see Regulation 20 representation $\underline{R10}$).

The Jubilee Gardens Trust (JGT, <u>R074</u>), Waterloo Community Development Group (<u>R040</u>) and Ms M Evers (<u>R065</u>) have raised concerns with the wording of policy PN1 (h)(vi), relating to the urban design objectives for Hungerford car park. The objective of this clause of the policy is to optimise connectivity between the MOL and the wider street network both physically and visually. The approaches from the north are particularly important as pedestrians on the east side of Belvedere Road can see through the railway bridge space towards Jubilee Gardens: this visual connection is essential. The part of MOL reaching northwards towards the viewer in the high foot-fall area where Concert Hall Approach meets Belvedere Road will entice people towards the MOL. Without this, the building line would come forward blocking the view and disconnecting the MOL. To clarify the meaning, the Council has proposed an amendment to the wording to read "through the Belvedere Road railway bridge" rather than "from the ... viaduct arch" (see PC094 in <u>SD17a</u>).

The JGT has also raised concerns about maintenance of the Gardens and the associated funding challenges. These are well understood by the Council, which maintains an ongoing dialogue with the Trust about this matter (led by the Regeneration directorate). Since the JGT submitted its Regulation 20 representation on the Plan raising this issue, the Council has worked with the JGT on a review of revenue resources from the London Eye S106 agreement, South Bank Business Improvement District and voluntary contributions to support urban management services on the South Bank including maintenance of Jubilee Gardens. This reached an agreed position on resourcing for this year and established a sustainable position for continued S106 support over the next three years. It is understood that the Trust has substantial reserves to help address any reductions in other private sector contributions to the Trust in future years. The Council continues to work pro-actively with the JGT on the issue of maintenance and management of Jubilee Gardens.

The issue is recognised in the Plan and appropriate references are included to ensure consideration of this issue and mitigation of harmful impacts of development through planning obligations, in accordance with the statutory tests governing their use - see paragraph 2.113, paragraph 3.6 seventh bullet point, strategic objective 11 on page 56, policy D4(b)(xiii) and supporting text (see also proposed changes PC012 to PC014 in <u>SD17a</u>), policy EN1(d)(ii) and paragraphs 9.10 and 9.11, paragraph 11.16, PN1(g), and the last sentence of PN1(h). It is not necessary to cross reference the other sections of policy on planning obligations within PN1 (h) because these will automatically apply. Policy PN1 (h) must balance all considerations and it is important that it does not limit potential for delivery of development on the one third of Hungerford car park designated for this, given the many constraints affecting that site and the many years it has remained undeveloped. Nevertheless, the Council has proposed an amendment to the wording of paragraph 11.10 to clarify the use of planning obligations (see PC091 in SD17a).

In addition, in response to the JGT representation, the Council has proposed an amendment to the wording of PN (h) to make clearer the importance of servicing arrangements (including sustainable watering) and to acknowledge the potential for supporting infrastructure subject to other policies on MOL and open space (see PC095 in <u>SD17a</u>). The wording already in paragraph 11.16 means the relationship between proposals for supporting infrastructure and the need to maintain Jubilee Gardens can and will be explicitly considered.

The requirement in PN1 (h) for ongoing provision of public toilets is reasonable given the level of usage of the Gardens. Their current location is intended to become part of Jubilee Gardens.

9.2 Policy PN2 (Vauxhall): including Site 10 (Albert Embankment and land to the rear bounded by Lambeth High Street, the railway viaduct and Southbank House, SE11), Site 11 (Keybridge House, 80 South Lambeth Road, 10-22 Wyvill Road (even) and 143-162 Wandsworth Road (odd), SW8 1RG), Site 12 (Land bounded by Wandsworth Road to the west, Parry Street to the north and the railway viaduct to the east, SW8), Site 13 (Plot bounded by Parry Street, Bondway and 7-93 Wandsworth Road, SW8 [Vauxhall Island Site]).

PN2 sets out the vision for the emerging CAZ retail cluster at Vauxhall and the role of mixed-use development in contributing to the growth of the retail cluster and Vauxhall's role in the CAZ and as part of the wider Opportunity Area. PN2a)-PN2p) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the London Plan targets for new homes and jobs in the wider Opportunity Area and to the residential and commercial growth potential identified in the London Plan. The policy is in accordance with London Plan policy SD1 and is consistent with the vision set out in the Vauxhall Nine Elms Opportunity Area Planning Framework (EB97). The policy retains the character areas identified in the Vauxhall Supplementary Planning Document (EB88) and sets out the aspirations for the mix of uses to come forward in each of these character areas. It also recognises the importance of the area's heritage assets in accordance with paragraphs 184, 185 and 186 of the NPPF. See also Topic Paper 8: Tall buildings for further detail on the approach to tall buildings.

The policy sets out a positive strategy for the CAZ retail cluster to meet the needs of local residents and workers in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8 and recognises the role of the area's railway arches to provide a mix of uses and to open up new walking and cycling routes as part of the borough's Low Line network.

The policy sets out a positive, justified and effective approach to supporting growth by working in partnership with TfL to deliver improvements to public transport infrastructure and road network alongside improvements to walking

and cycling in accordance with the <u>Lambeth Transport Strategy and Healthy</u> <u>Route Network (EB43)</u> and an increased role of the River Thames. See also the <u>Lambeth Infrastructure Delivery Plan (EB99)</u>. The policy supports improvements to sustainability, social infrastructure, air quality, green infrastructure and the quality, safety and accessibility of public realm. This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF.

See also potential changes PC99 and PC100 of <u>SD17a</u>, which are corrections in response to comments received about the timing of infrastructure improvements.

9.3 Policy PN3 (Brixton): *including Site 14* (Somerleyton Road, SW9), Site 15 (Popes Road, SW9), Site 16 (Brixton Central [between the viaducts], SW9).

PN3 sets out a vision for delivering economic, social and environmentally sustainable development in Brixton and developing a broader and more resilience local economy, as identified in the <u>Brixton Economic Action Plan</u> (EB91). PN2a)- PN2p) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan. The policy applies to both the town centre and the wider Brixton area. <u>See also Topic Paper 8: Tall buildings</u> for further detail on the approach to tall buildings.

PN3 sets out a positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8. The boundary of the town centre and the primary shopping area have been reviewed to ensure they are up to date and accurate to support the vision for the town centre. These changes work alongside the positive approach to the role of the area's railway arches to provide a mix of uses and to contribute to the wider functions of the area, including the Brixton Creative Enterprise Zone. See paragraphs 3.7 – 3.12 of Topic Paper 4: Town Centres (TP04) for further justification of these changes.

Further detail on the approach to the Indoor Markets can be found at paragraphs 4.30 – 4.63 of <u>Topic Paper 4: Town Centres (TP04)</u> and further detail on the approach to the management of the evening economy in Brixton can be found at paragraphs 4.1 – 4.29 and Appendix 1 of <u>Topic Paper 4: Town Centres (TP04)</u>. The policy supports the growth and diversification of the evening and night-time economy whilst managing its impact on local residents and the local environment in accordance with London Plan policy HC6. The approach has been developed taking account into concerns raised by local residents during the Issues consultation as set out in section 3.14 of the <u>Issues consultation report</u> (SD15). The boundary of the evening economy management zone on Acre Lane, Coldharbour Lane and Atlantic Road manages the recent growth in the environment. Outside of the evening economy management zone, these uses will be managed through the application of PN3a), PN3b) and PN3d). Outside of the town centre the uses will be managed through the town centre first principle

set out in ED7 and ED8. This is consistent with paragraphs 85, 86 and 91 of the NPPF.

The policy also sets out a positive, effective and justified strategy for the promotion and growth of the creative and digital industries and the delivery of new workspace as part of the Brixton Creative Enterprise Zone, in accordance with London Plan policy HC5. See also paragraphs 3.12 – 3.15 of <u>Topic Paper 3:</u> <u>Workspace (TP3)</u> and the <u>Brixton Creative Enterprise Zone Research Study 2018</u> (EB27).

The policy sets out a positive, justified and effective approach to supporting growth by working in partnership with TfL to deliver improvements to public transport infrastructure alongside improvements to walking and cycling in accordance with the <u>Lambeth Transport Strategy and Healthy Network (EB43)</u>. See also the <u>Lambeth Infrastructure Delivery Plan (EB99)</u>. The policy supports improvements to air quality, green infrastructure and the quality, safety and accessibility of public realm. This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF. Planning obligations will be sought on a case by case basis, in accordance the statutory tests governing their use. This will include consideration of the relationship between a development and the station, the impact of increased trips on the public realm and usage of the station, and the extent to which these impacts may need to be mitigated.

Please note the potential changes to the wording of PN3 and supporting text, proposed as corrections and clarifications (PC105 to PC109 in <u>SD17a)</u>.

9.4 Policy PN4 (Streatham)

PN4 sets out a vision for enhancing Streatham's role as a vibrant and viable major town centre with a diverse economy, including increasing the provision of office and workspace for creative and digital industries, as set out in the <u>Streatham Investment and Growth Strategy (EB96)</u>. PN4a) – PN4g) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan. This includes opportunities for development at Streatham Hill and Streatham Central to deliver a mix of uses to support the overall vision for the area.

PN4 sets out a positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8. See paragraphs 3.13 – 3.43 of <u>Topic Paper 4: Town Centres (TP4)</u> for the justification for the changes to the boundaries of the town centre and two primary shopping areas and 4.39 – 4.50 of <u>Topic Paper 4: Town Centres (TP4)</u> for the justification for the approach to retail in the two primary shopping areas which will help support the vitality and viability of the town centre through the diversification of uses. This approach has been informed by consultation with representatives of the local residential and business community, including the Business Improvement District.

The policy sets out a positive, justified and effective approach to supporting growth through improvements to public transport infrastructure, and to improve heritage assets, air quality, green infrastructure and the quality of the public realm in the area alongside improvements to walking, cycling in accordance with the with the Lambeth Transport Strategy and Healthy Route Network (EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). This is consistent with paragraphs 91, 96, 102, 104, 181 and 185 of the NPPF.

9.5 Policy PN5 (Clapham)

PN5 sets out a vision for supporting the role of Clapham High Street as a district centre, enhancing the area's distinctive character and historic environment and recognising the role of Clapham Common as Metropolitan Open Land. PN5a) – PN5j) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan.

PN5 sets out positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8 and seeks to manage the mix of food and drink uses in accordance with London Plan policy HC6. This aligns with the council's licensing policy.

The policy sets out a positive, justified and effective approach to supporting growth by working in partnership with TfL to deliver improvements to public transport infrastructure alongside improvements to walking and cycling in accordance with the Lambeth Transport Strategy and Healthy Network (EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). The policy supports improvements to air quality, green infrastructure and the quality, safety and accessibility of public realm. This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF. See also Your Clapham – A vision for Clapham High Street, 2016 (EB94).

9.6 Policy PN6 (Stockwell)

PN6 sets out a vision for supporting for the role of Stockwell as a district centre with a community focus and supporting it to realise the benefits of its location close to the Opportunity Area. PN5a) – PN5j) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan.

PN6 sets out positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8.

The policy sets out a positive, justified and effective approach to supporting growth through improvements air quality, green infrastructure and the quality and safety of the public realm in the area alongside improvements to walking, cycling in accordance with the Lambeth Transport Strategy and Healthy Network

(EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF.

9.7 Policy PN7 (West Norwood/Tulse Hill): *including Site 18 (286-362 Norwood Road, SE27)*

PN7 sets out a vision for supporting development and growth of West Norwood/Tulse Hill as a vibrant district centre, to improve the quality and variety of retail floorspace and to increase workspace, education uses, community facilities, cultural uses and housing. PN7a) – PN7f) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan. This includes focussing development and investment towards the five focal areas: West Norwood Central Retail Area (Site 18), West Norwood Commercial Area, Norwood High Street, West Norwood Cultural and Heritage Area and Tulse Hill.

The policy approach has been informed by extensive input from local community representatives (see section 3.14 of the <u>Issues consultation report (SD15)</u> and section 11 of the <u>Draft Revised Lambeth Local Plan consultation report (SD16a)</u>. See also Proposed Change of PC111 of <u>SD17a</u>. The policy also recognises the aspirations of the neighbourhood planning forum to develop the Norwood Green Town Plan and has been informed by the <u>West Norwood and Tulse Hill: A Manual For Delivery (EB92)</u>.

PN7 sets out a positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8. See paragraphs 3.51 – 3.59 of <u>Topic Paper 4: Town Centres (TP04)</u> for the justification for the boundary changes to the town centre and primary shopping area to support the strategy for the town centre.

PN7 sets out a positive, justified and effective approach to industrial floorspace and workspace in the area. The Key Industrial and Business Area remains protected for industrial use in accordance with Policy ED3.

The growth of workspace in the area will be further supported through the designation of a Creative Business Cluster to refine and revitalise part of Norwood High Street to the south of the railway line for creative and digital industries, in accordance with London Plan Policy HC5. This builds on the area's proximity to the KIBA, West Norwood station and heritage and cultural assets. See paragraphs 3.51 – 3.59 of Topic Paper 4: Town Centres (TP04) and paragraphs 3.16 – 3.18 of Topic Paper 3: Workspace (TP03).

The role of the area's existing cultural, community and heritage assets will be protected and strengthened, including West Norwood Cemetery. This is in accordance with London Plan policy HC5 and paragraphs 91, 92 and 185 of the NPPF.

The policy sets out a positive, justified and effective approach to supporting growth through improvements to public transport infrastructure alongside

improvements to walking and cycling, particularly at Tulse Hill, in accordance with the <u>Lambeth Transport Strategy and Healthy Route Network (EB43)</u>. See also the <u>Lambeth Infrastructure Delivery Plan (EB99)</u>. The policy supports improvements to air quality, green infrastructure and the quality, safety and accessibility of public realm. This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF.

Please see the potential changes to wording in policy PN7 and supporting text, proposed as corrections and clarifications (PC111 and PC112 in <u>SD17a</u>).

9.8 Policy PN8 (Kennington Oval)

PN8 sets out a vision for supporting the growth of Kennington/Oval as an important residential and employment area, enhancing its well-defined character and seeking maximum community benefit from development proposals, particularly given its location close to the Opportunity Area and the opportunities for mixed-use development at the Oval Gasworks. PN8a) – PN9j) set out a positive, justified and effective strategy for achieving this vision and will apply alongside other development plan policies to deliver new housing, town centre uses in the area's local centres, and industrial capacity.

The policy sets out a positive, justified and effective approach to supporting growth through improvements to public transport infrastructure, and to improve air quality, green infrastructure and the quality and safety of the public realm in the area alongside improvements to walking, cycling in accordance with the Lambeth Transport Strategy and Healthy Route Network (EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF. Improving air quality and increasing green infrastructure in the area is also a priority for the emerging Kennington, Oval and Vauxhall neighbourhood plan.

Please see the potential changes to wording in policy PN8 and supporting text, proposed as a corrections and in response to a comment from Transport for London (PC113 and PC113 in <u>SD17a</u>).

9.9 Policy PN9 (Herne Hill)

PN9 sets out a vision for supporting the role of Herne Hill as a small-community focussed district centre, recognising the importance of a co-ordinated approach to the centre with the London Borough of Southwark. PN9a) – PN9h) set out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan.

PN9 sets out a positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8; and for the promotion and growth of the creative and digital industries and the delivery of new workspace as part of the Brixton Creative Enterprise Zone, in accordance

with London Plan policy HC5. See also paragraphs 3.12 – 3.15 of <u>Topic Paper 3:</u> <u>Workspace (TP3)</u>, and the <u>Brixton Creative Enterprise Zone Research Study</u> <u>2018 (EB27)</u>.

The policy sets out a positive, justified and effective approach to supporting growth through improvements to public transport infrastructure, and to improve air quality, green infrastructure and the quality and safety of the public realm in the area alongside improvements to walking, cycling in accordance with the Lambeth Transport Strategy and Healthy Route Network (EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF.

9.10 Policy PN10 (Loughborough Junction)

PN10 sets a vision for how the Council will work local stakeholders to support the role of Loughborough Junction as a centre with a clear identity and sense of place. This includes using the area's railway bridges as a catalyst for change, making greater use of under-used spaces and places and bringing forward new housing where appropriate. PN10a) – PN10g) set out a positive, justified and effective strategy for achieving this vision and will apply alongside other development plan policies to deliver new housing, workspace, town centre uses in the area's local centre and industrial capacity.

The policy approach and supporting text has been informed by extensive input from local community representatives (see section 3.14 of the <u>Issues</u> <u>consultation report (SD15)</u> and section 11 and Appendix 1 of the <u>Draft Revised</u> <u>Lambeth Local Plan consultation report (SD16a)</u>.

PN10 sets out a positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8 which will apply alongside other development plan policies, including ED7 and ED11. A positive approach is also taken to address the specific needs of these railway arches and to support the comprehensive and refurbishment of the Rathgar Road railway arches, through an appropriate mix of uses to complement the local centre.

The policy recognises the importance of assets including the Marcus Lipton, Grove Adventure Playground and Elam Open Street open space for the local area which will be protected through the application of other development plan policies, including S1 and EN1 to ensure an adequate supply of supervised facilities for children and young people, as well as other community facilities to meet local needs. This is consistent with paragraphs 91, 92, 96 and 97 of the NPPF.

PN10 sets out a positive, justified and effective approach to industrial floorspace and workspace in the area, identifying opportunities for improvements to the area's yards, including KIBAs and non-designated industrial sites; and for the promotion and growth of the creative and digital industries and the delivery of new workspace as part of the Brixton Creative Enterprise Zone, in accordance with London Plan policy HC5. See also paragraphs 3.12 – 3.15 of <u>Topic Paper 3</u>: Workspace (TP3), and the Brixton Creative Enterprise Zone Research Study 2018 (EB27).

The policy sets out a positive, justified and effective approach to supporting growth through working in partnership to deliver improvements to public infrastructure and improvements to air quality, access to green infrastructure and the quality, accessibility safety of the public realm in the area alongside improvements to walking, cycling in accordance with the Lambeth Transport Strategy and Healthy Network (EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF.

Please note that the Council has proposed a number of potential changes to the wording of Policy PN10 and supporting text, as corrections and clarifications in response to representations from the Loughborough Junction Action Group and Neighbourhood Forum, Transport for London and King's College Hospital Foundation Trust - see PC115 to PC125 of <u>SD17a.</u>

9.11 Policy PN11 (Upper Norwood/Crystal Palace)

PN11 sets out a vision for supporting the role of Upper Norwood/Crystal Palace as a district centre and how it will work with adjoining boroughs to safeguard and encourage retail and other town centre uses, including housing. PN11a) – PN11g) recognises the importance of a co-ordinated approach to the area and sets out a positive, justified and effective strategy for achieving this vision, including how new development will contribute to the residential and commercial growth potential identified in the London Plan. See also Joining the Dots, Crystal Palace - 2015 (EB93).

PN11 sets out positive strategy for the town centre in accordance with paragraph 85 of the NPPF and London Plan policies SD6, SD7 and SD8 and protects cultural, creative and digital uses that have been identified as important by the local community, in accordance with London Plan policy HC5. See section 3.14 of the <u>Issues consultation report (SD15)</u>.

The policy sets out a positive, justified and effective approach to supporting growth through improvements to public transport infrastructure, working in partnership with TfL and adjoining boroughs, and improvements to air quality, green infrastructure and the quality and safety of the public realm in the area alongside improvements to walking, cycling in accordance with the Lambeth Transport Strategy and Healthy Route Network (EB43). See also the Lambeth Infrastructure Delivery Plan (EB99). This is consistent with paragraphs 91, 96, 102, 104 and 181 of the NPPF.

Please note that the Council has proposed three potential changes to the wording of Policy PN11 and supporting text, as corrections and clarifications in response to representations from the LB Bromley and Transport for London- see PC126 to PC128 of <u>SD17a.</u>