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Date: 30 October 2020



Planning Policy Team,
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Dear Ms Edwards,

REPRESENTATIONS ON BEHALF OF SOUTHBANK CENTRE STATEMENT TO THE LAMBETH LOCAL PLAN EXAMINATION

Further to our discussions last week, this statement is submitted on behalf of Southbank Centre in response to the Matters, Issues and Questions Discussion Document (Doc INS03) for the Draft Revised Lambeth Local Plan (the draft Local Plan) Examination.

First, apologies for the late submission and we hope that, as discussed, the following can be considered in the course of the Examination.

Southbank Centre is one of the largest landowners within the Waterloo and South Bank Opportunity Area and its site and performance spaces, which includes the Royal Festival Hall, the Queen Elizabeth Hall, Purcell Room and the Hayward Gallery, are one of the UK's leading international cultural and tourist destinations. It is within this context that Southbank Centre recognise the importance of the Lambeth Local Plan and welcomes the opportunity to contribute to the Examination process.

As the Inspector will be aware, Southbank Centre have engaged positively with the Council during the production of the draft Local Plan and have previously submitted representations during the Local Plan Review Issues Consultation (i.e. Regulation 18 Stage 1 - December 2017), the Draft Revised Lambeth Local Plan Consultation (i.e. Regulation 18 Stage 2 - December 2018) and Draft Revised Lambeth Local Plan Proposed Submission Version Consultation (Regulation 19 - March 2020).

Following the collaborative engagement with the Council throughout the consultation stages, **Southbank Centre is pleased to support the draft Local Plan and considers the draft Local Plan to be sound. Of specific relevance to Southbank Centre, Policy PN1 (Waterloo and South Bank) is considered to be positively prepared, justified, effective and consistent with national policy.**

In order to assist with consideration of Matter 9.1 of the Matters, Issues and Questions Discussion Document (Doc INS03), this statement confirms Southbank Centre's support for responses made by the Council in the Regulation 22 Consultation Statement (Doc PD06) and provides a summary of the current status of relevant aspects of the Southbank Centre's activities and proposals.



a) Support for MOL Boundary at Jubilee Gardens and wording of Policy PN1

As we have stated previously, Southbank Centre **strongly supports** the proposed Metropolitan Open Land (MOL) boundary at Jubilee Gardens, as shown on Map 8.4 of the 'Proposed Changes to the Policies Map January 2020' (Doc PD02), and the proposed wording of Policy PN1 (Waterloo and South Bank) of the draft Local Plan.

In support of the Council's response to comments made by Waterloo Community Development Group, Friends of Jubilee Gardens and a local resident (at page 113-114 of the Regulation 22 Consultation Statement (Doc PD06)), Southbank Centre considers the MOL boundary shown on Map 8.4 and the wording of Policy PN1 Part (h) to be legally compliant and sound.

As recognised in the Local Plan, it has been a long-standing Council and GLA objective to secure the use of Hungerford car park as an extension to Jubilee Gardens. Two-thirds of the car park land is protected as MOL for an extension to Jubilee Gardens with the remainder of the site to be used for arts and cultural facilities, including associated uses to support the South Bank's role as a cultural quarter.

Southbank Centre are committed to bringing forward a new development on the non-MOL portion of the Hungerford Car Park and, in 2018, Southbank Centre commissioned studies to investigate how that might be achieved¹. Southbank Centre continued feasibility and design work throughout 2019 and initial plans were shared with the Council as part of the Local Plan consultation discussions.

The proposed MOL boundary shown on Map 8.4 reflects this feasibility and design work and the collaborative engagement between Southbank Centre, the Council and key stakeholders.

Southbank Centre intended to develop the proposal for this site further and start formal pre-application discussions with the Council in 2020. However, the Southbank Centre has been forced to put the development plans on hold due to the financial and operational restrictions caused by the Covid-19 pandemic.

Despite the uncertainty caused by Covid-19, Southbank Centre remain committed to developing the site and the current MOL boundary and policy wording would facilitate this, in accordance with the objectives of the Council, the GLA and the wider South Bank community.

a) Support for the updated Westminster World Heritage Site 'Immediate Setting' Area

In the representations that we submitted to the Council at Regulation 18 Stage 2, Southbank Centre objected to the proposed extent of the Westminster World Heritage Site (WWHS) 'Immediate Setting' Area. Southbank Centre suggested that the boundary of the Immediate Setting Area be amended in relation to Hungerford Car Park.

¹ As stated in Southbank Centre's Representations to the Draft Revised Lambeth Local Plan October 2018 Consultation (17/12/2018)

It was confirmed in the Council's Regulation 19 Consultation Report (pages 339-341 and 342) that the Southbank Centre's suggested amendment to the boundary had been accepted, however, the change did not appear on the Regulation 19 Proposed Changes to the Policies Map document.

On this basis, Southbank Centre submitted a further objection to the boundary of the WWHS 'Immediate Setting' Area during the Regulation 19 consultation.

At page 130 of the Regulation 22 Consultation Statement (Doc PD06), the Council acknowledge that the Regulation 19 Proposed Changes to the Policies Map was incorrect and confirm that boundary of the Immediate Setting Area would be corrected through an amendment to Map 12. This amendment is now shown on page 140 of the Council's Schedule of Potential Changes Updated June 2020 (Doc SD17a).

Based on this amended boundary, Southbank Centre **supports** the updated Westminster World Heritage Site 'Immediate Setting' Area and withdraws the previous objections.

b) Policy PN1 Part (h) - Additional Funding for the Jubilee Gardens Trust

Southbank Centre **supports** the Council's dismissal of the proposal for an additional reference in Policy PN1 Part (h) related to the need for revenue to manage the extension of the Gardens (pages 112-113 of the Regulation 22 Consultation Statement (Doc PD06)). The current wording of Part (h) is considered to be positively prepared and does not limit the potential for delivery of development on the Hungerford Car Park. On this basis, we agree with the Council that the wording of the policy should not be amended.

As acknowledged above, the non-MOL portion of the Hungerford Car Park has a long history of complex planning, physical and financial constraints affecting its development.

Southbank Centre are committed to bringing forward a new development on the non-MOL portion of the Hungerford Car Park and, once the planning proposal has been finalised and submitted, the mitigation of any harmful impacts of that development can be secured through planning obligations, in accordance with national and local policy and the statutory tests governing their use. Any additional or specific funding requirements included in the wording of Policy PN1 could restrict delivery and create unnecessary duplication of other policies within the Local Plan (i.e. Policy D4 - Planning Obligations) and would, therefore, not comply with paragraph 16 of the NPPF.

c) Conclusions

Southbank Centre thanks the Inspector for accepting this statement and hopes that it provides a useful detail and context with regards to Matter 9.1 of the Matters, Issues and Questions Discussion Document (Doc INS03).

Please do not hesitate to contact me should you have any queries or require any further information at this stage.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Adam Coombs", enclosed in a thin black rectangular border.

Adam Coombs

Associate

cc.	Mike McCart	-	Southbank Centre
	Susan Johnston	-	Southbank Centre
	Kim Schofield	-	Southbank Centre