

**Carmel Edwards
Programme Officer**

By email: programmeofficer@carmeledwards.com

9 October 2020

Dear Carmel,

**EXAMINATION OF DRAFT REVISED LAMBETH LOCAL PLAN 2020 - 2035
MATTER 9: PLACES AND NEIGHBOURHOODS (POLICY PN1 - WATERLOO AND SOUTH BANK)**

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 9: Places and Neighbourhoods (Policy PN1 - Waterloo and South Bank)

In the Inspector's Matters, Issues and Questions (MIQ) Discussion Note (Revised at 30 September 2020), the following is asked under Matter 9: Places and Neighbourhoods (Policy PN1 - Waterloo and South Bank):

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

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)."

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 2: Spatial Strategy, Vision and Objectives we feel that the above comments are also relevant to Main Matter 9.

We make the following additional comments, with reference to the submission that we made via previous representations, reference R072.

Green Infrastructure

Part g) of Policy PN1 promotes high quality public realm and recognises the role that it performs in South Bank and Waterloo. It states:

'Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events, and actively contribute to the enhancement of the collective public realm and increase amount of green infrastructure in the area. See guidance in the Waterloo and South Bank Public Realm Framework'.

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. Paragraph 11.12 - in reference to highway/public realm capacity, improvements to the quality, permeability, accessibility and safety of public spaces - includes the statement that "The Waterloo and South Bank Public Realm Framework 2019 provides guidance on this". The draft 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.

We believe that it is important that this policy emphasises and delivers investment to the areas where there is intensity of development. We are concerned that the proceeds of development are taken out of the local area and are not being re-invested in the areas that need it. Examples of the need to invest in the area's green infrastructure include Bernie Spain Gardens and Jubilee Gardens. These needs are identified in the South Bank and Waterloo Neighbourhood Plan, which has now been "made" by both Lambeth Council and Southwark Council.

There are several significant developments coming forward in the South Bank and Waterloo area and it is important that contributions are spent on local infrastructure, including green spaces. 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.

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 Lambeth¹).

As such, we suggest that part g) of Policy PN1 is reworded:

“Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events, and actively contribute to the enhancement of the local collective public realm, and increase the amount of green infrastructure in the South Bank and Waterloo area”.

Although there are policies in the draft Plan that relate to the use of planning gain to support green space and its management, there is competition for the allocation of planning-related revenues and, in our experience, these allocations are not made in a way that meets the need. In 2017, SBEG undertook analysis to demonstrate this, and there have been no significant new Section 106 contributions to green open space in the neighbourhood since the early 2000s when the London Eye and Shell contributions to Jubilee Gardens were secured.

As noted above, 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

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