

Pre-Submission Publication Representation Form



Ref:

R010

(for official use only)

Name of the document (DPD) to which this representation relates:

Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (DRLLP PSV Jan 2020) and associated Proposed Changes to the Policies Map January 2020 (PCPM Jan 2020)

Please return to: localplan@lambeth.gov.uk

or by post: Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG

by 11pm on 13th March 2020.

Please read the Guidance Note and Privacy Notice attached to this form before completing the representation form or submitting your comments

This form has two parts –

Part A – Personal details (please see applicable privacy notices in Section 5 of the guidance note)

Part B – Your representation(s). Please fill in a separate sheet for each part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you wish to make a representation about.

Part A

1. Personal details*

2. Agent's details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	MR	MR
First name	MARK	RICHARD
Last name	RUSHWORTH	HESKETH
Job title [†]		DIRECTOR
Organisation [†]	SOUTHBANK CENTRE	QUOD
Address		INGENI BUILDING
		17 BROADWICK STREET
		LONDON
Postcode		W1F0DE
Telephone		02035971000
Email [†]		richard.hesketh@quod.com

[†] where relevant

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Part B – please use a separate sheet for each representation

3. To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? *(identify specific reference if possible)*

Paragraph no. Policy no. Policies Map

4. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is:

(please tick)

4.1 Legally compliant

Yes

No

4.2 Sound[^]

Yes

No

4.3 Complies with the Duty to co-operate

Yes

No

[^] *The considerations in relation to being 'sound' are explained in the notes at the back of this form. If*

you have ticked 'No' to 4.2, please continue to Q5. Otherwise please go to Q6.

5. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is unsound because it is not:

(please tick)

5.1 Positively prepared

5.2 Justified

5.3 Effective

5.4 Consistent with national policy

(Please tick only one option. A separate form should be used if you wish to raise more than one concern.)

6. Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible

If you wish to support the legal compliance or soundness of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 or their compliance with the duty to co-operate, please also use this box to set out your comments and then go to Q9.

SEE COVERING LETTER

(if required continue on the additional comments page attached)

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7. Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound, having regard to the test you have identified in Q5 above where this relates to soundness. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why this change will make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of this part of policy or text. Please be as precise as possible.

(if required continue on the additional comments page attached)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change to the DRLLP PSV Jan 2020 or associated PCPM Jan 2020, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate. If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(if required continue on the additional comments page attached)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.


10. Please tick relevant boxes if you require notification of any of the following to your address stated in Part A:

That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination

The publication of the inspector's recommendations following the independent examination

The adoption of the Revised Lambeth Local Plan and Policies Map.

Signature



Date

09/03/2020

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Part B – please use a separate sheet for each representation

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Paragraph no. Policy no. Policies Map

4. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is:

(please tick)

4.1 Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.2 Sound[^]	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.3 Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

[^] *The considerations in relation to being 'sound' are explained in the notes at the back of this form. If*

you have ticked 'No' to 4.2, please continue to Q5. Otherwise please go to Q6.

5. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is unsound because it is not:

(please tick)

5.1 Positively prepared	<input type="checkbox"/>
5.2 Justified	<input checked="" type="checkbox"/>
5.3 Effective	<input checked="" type="checkbox"/>
5.4 Consistent with national policy	<input type="checkbox"/>

(Please tick only one option. A separate form should be used if you wish to raise more than one concern.)

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AMENDMENT OF MAP 12 OF THE PCPM.

SEE COVERING LETTER

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The publication of the inspector's recommendations following the independent examination

The adoption of the Revised Lambeth Local Plan and Policies Map.

Signature

Richard H...

Date

09/03/2020

Our ref: Q090718
Your ref:
Email: richard.hesketh@quod.com
Date: 9 March 2020



Lambeth Council
Planning Policy and Strategy
PO Box 734
Winchester
SO23 5DG

localplan@lambeth.gov.uk

Dear Sir/Madam,

**DRAFT REVISED LAMBETH LOCAL PLAN PROPOSED SUBMISSION VERSION JANUARY 2020
CONSULTATION (JANUARY – MARCH 2020)
SOUTHBANK CENTRE, BELVEDERE ROAD, LONDON, SE1 8XX
REPRESENTATIONS ON BEHALF OF SOUTHBANK CENTRE**

Further to our discussions with Officers, we are writing on behalf of Southbank Centre in response to London Borough of Lambeth's (LBL) Draft Revised Lambeth Local Plan Proposed Submission Version 2020 Consultation.

The Southbank Centre site is identified in the current Lambeth Local Plan and the London Plan as being within a Strategic Cultural Area in recognition of its role as a strategically important area for arts, culture and entertainment. The 5.3-hectare site is one of the UK's leading international cultural and tourist destinations. Southbank Centre is also one of the largest landowners within the Waterloo and South Bank Opportunity Area. It is within this context that Southbank Centre recognise the importance of the Lambeth Local Plan Review and welcomes the opportunity to comment on this important local planning policy document.

As the Council are aware, we have previously submitted representations on the Local Plan Review Issues Consultation (December 2017) and the Draft Revised Lambeth Local Plan (December 2018) on behalf of Southbank Centre.

Southbank Centre welcomes the opportunity to continue its involvement in the Local Plan process, working collaboratively with the Council and other stakeholders on this important document.

In addition to this letter, please find enclosed two completed copies of the 'Pre-Submission Publication Representation Form'.

a) Background

Southbank Centre is a world-famous, multi-venue arts centre providing a year-round arts and culture festivals and programming. The site includes the Grade I Royal Festival Hall, the Queen Elizabeth Hall, Purcell Room, Hayward Gallery and The National Poetry Library. Southbank Centre's wider estate also includes land at the Hungerford Car Park.



Approximately 27 million people a year visit the site to experience the 5,000+ events that Southbank Centre host, featuring world-class artists from across the world. Southbank Centre employ approximately 500 people across a range of different professions and work in conjunction with over 1,000 artists on an annual basis.

In addition to the core arts and cultural facilities, the site also comprises a number of complementary uses that contribute to this site as an international tourist destination, such as restaurants and shops. Southbank Centre has also been successfully organising, hosting and managing seasonal festivals and events since 2008. Southbank Centre continue to diversify and adapt their festivals, events and installations to maintain interest and excitement in arts and culture.

b) Support for MOL Boundary at Jubilee Gardens (Map 8.4 / Policy PN1)

Southbank Centre **strongly supports** the proposed Metropolitan Open Land (MOL) boundary at Jubilee Gardens, as shown on Map 8.4, and the proposed wording of Policy PN1 (Waterloo and South Bank). In particular, Southbank Centre supports the following criteria of Policy PN1:

- **Criterion f)** which promotes enhancing the South Bank in its role as an international cultural and leisure centre and a London tourist destination through supporting the development of arts and cultural facilities, associated and supporting uses.
- **Criterion h)** which supports the extension of Jubilee Gardens on two thirds of Hungerford Car Park and the development on one third of Jubilee Gardens for arts and cultural development (and enabling uses).

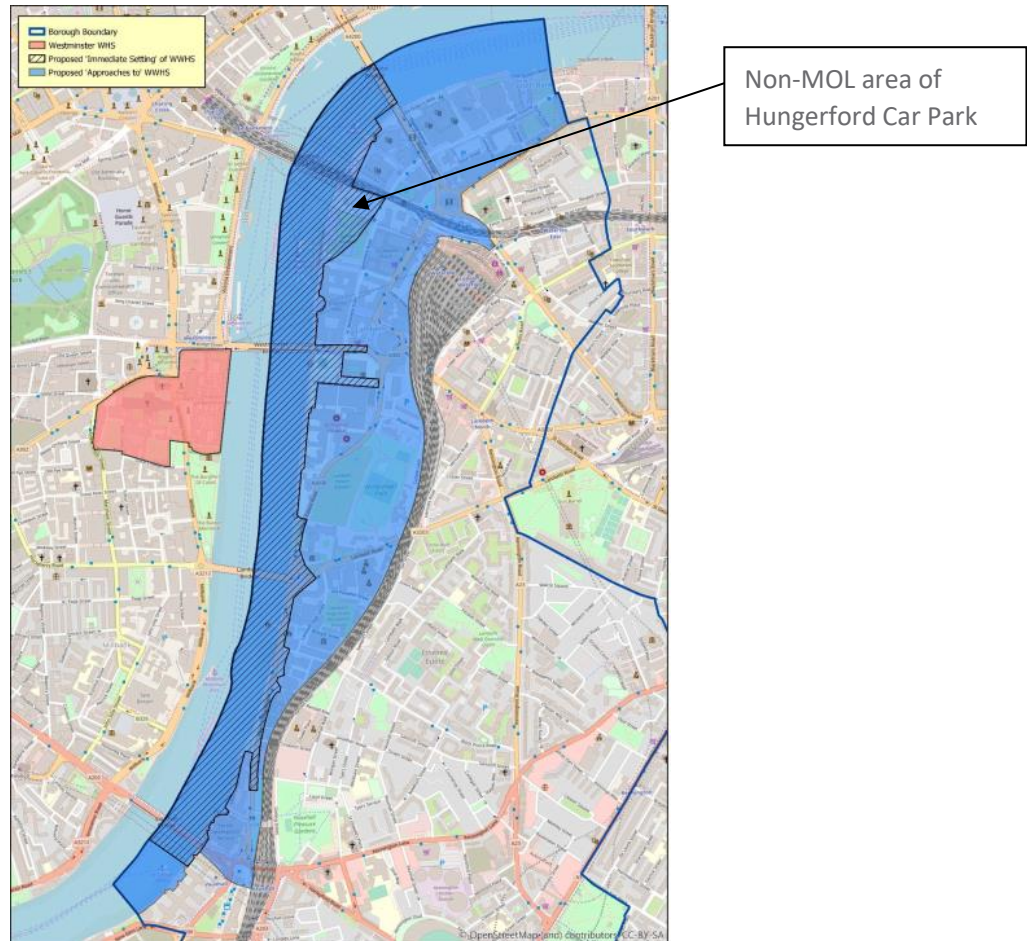
The MOL boundary shown on Map 4 of the Proposed Changes to the Policies Map (PCPM) (January 2020) and the full wording proposed for criterion h) of Policy PN1 is considered to be legally compliant, sound and compliant with the Council's duty to co-operate. The MOL Boundary and policy wording has been informed by collaborative working between the Council, Southbank Centre and other stakeholders and will help deliver the successful redevelopment of Hungerford Car Park in accordance with the objectives of the Council, the GLA and the wider South Bank community, as well as the Local Plan itself.

c) Objection to Westminster World Heritage Site 'Immediate Setting' Area

In the representations that we submitted to the Council on 17 December 2018 in response to the Draft Revised Lambeth Local Plan consultation, Southbank Centre objected to the precise extent of the proposed Westminster World Heritage Site (WWHS) 'Immediate Setting' Area. Southbank Centre requested that the boundary of the proposed Immediate Setting Area was amended in relation to Hungerford Car Park.

The amendment requested previously has not been made to the Immediate Setting Area and, as discussed with officers, Southbank Centre maintains this **objection**. The concerns relate to the way in which the Immediate Setting Area extends to include the non-MOL area of the Hungerford Car Park (as shown on the Plan 1 below).

Plan 1 – PCPM Jan 2020 Map 12 – Proposed new Westminster World Heritage Site Zones

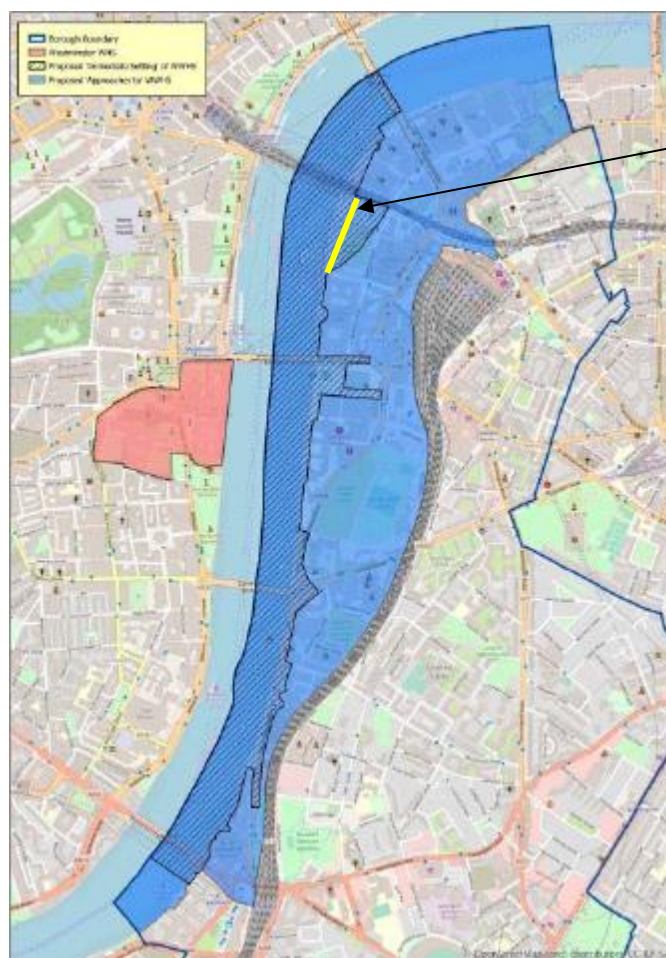


It is unclear why the Immediate Setting Area has been extended to cover Hungerford Car Park, whereas the rest of the boundary follows the edge of the Queen’s Walk. The non-MOL portion of the Hungerford Car Park is approximately 730 metres from the WWHS and is separated by the London Eye and significant vegetation. It is therefore not considered to be within the Immediate Setting of the WWHS and it is recommended that the boundary is amended to remain flush with the edge of the Queen’s Walk (as shown in yellow on Plan 2 below).

The boundary of the ‘Immediate Setting’ Area appears to be based on the existing undeveloped status of the land at Hungerford Car Parks. This is the interim position and as part of the redevelopment of the Hungerford Car Park, it has been a long-standing Council and GLA objective to secure a new arts and cultural facility on the de-designated land. This objective should not be unintentionally impeded by the new Local Plan and the extension of the Immediate Setting Area across the de-designated land and the boundary should be reviewed with the intended redevelopment in mind.

The Immediate Setting Area currently proposed on Map 12 of the Proposed Changes to the PCPM 2020 is considered to be unsound since it is not justified or effective in order to meet the objectives of the Revised Local Plan and, in particular, Policy PN1. Amending the boundary of the Immediate Setting Area as proposed on Plan 2 below would ensure the plan is sound and help deliver the successful redevelopment of Hungerford Car Park in accordance with the objectives of the Council, the GLA and the wider South Bank community, as well as the Local Plan itself.

Plan 2 - PCPM Jan 2020 Map 12 – Proposed new Westminster World Heritage Site Zones (Amended)



Amended Immediate Setting Area

d) Conclusions

Southbank Centre are keen to engage further in the process for preparing the Revised Local Plan and welcome future opportunities to comment as the plan continues to progress. We would be very pleased to meet with officers to discuss these matters further should that be helpful.

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 "Richard Hesketh".

Richard Hesketh
Director

cc. Mark Rushworth - Southbank Centre
Kim Schofield - Southbank Centre