

Pre-Submission Publication Representation Form



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

Ref:

R011

(for official use only)

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	
First name	Danny	
Last name	Howcroft	
Job title [†]	Estate Director	
Organisation [†]	Blenheim Gardens Residents' Management Organisation	
Address		
Postcode		
Telephone		
Email [†]		

[†] 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	<input type="text"/>	No	<input type="text"/>
4.2 Sound [^]	Yes	<input type="text"/>	No	<input checked="" type="text" value="X"/>
4.3 Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

[^] 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 checked="" type="text" value="X"/>
5.2 Justified	<input type="text"/>
5.3 Effective	<input type="text"/>
5.4 Consistent with national policy	<input type="text"/>

(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.

In 3.8 of Section 3: Spatial Strategy, Vision and Strategic Objectives, the draft plan acknowledges "the need for more open space...to serve the growing population" but concludes "there is no land available to deliver a major new park". As a next-best option, the plan proposes existing open space be safeguarded and its quality and access improved. This element of the proposed Spatial Strategy, Vision and Strategic Objectives appears not to meet the 'positively prepared' test, as assessment of objective needs and exploration with other authorities and bodies, such as Thames Water, about the potential re-purposing of sites as new public parkland has not been attempted or considered. In high-density areas, such as Brixton Hill, major sites recognised as likely to be redeveloped in coming years have not been assessed for their potential to be redeveloped as new open space.

(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.

We propose the following rewording of 3.8: There is a need for more open space in the borough to serve the borough's growing population. A borough-wide assessment will be undertaken to identify sites that may offer opportunities for the creation of new open space, including sites owned by other public sector and publicly-funded organisations, regulated industries, and private sector firms. Major development sites will be included in this assessment. Existing open spaces will be pro-actively safeguarded - with the goal of achieving no net loss of open space - and improvements will be made to the quality and access to existing open space as well as the linkages between them. The reorganisation of open space as part of estate regeneration projects will not result in any net loss of open space. The planned extension to Jubilee Gardens will deliver some additional open space and the quantity and coverage of green infrastructure provision across the borough will increase.

(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:

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

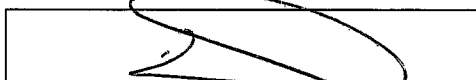
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The publication of the inspector's recommendations following the independent examination

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

Signature



Date

9 March 2020

Please use this section for any additional/continued comments