

Tell us who you are

Ref: R013

Title

Ms

First name

Giulia

Surname

Bunting

Email address

giulia@tulleybunting.com

Agent's details

Are you an agent?

Yes

No

Title

Ms

First name

Giulia

Last name

Bunting

Job title (optional)

Organisation

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Postcode

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Representors details

Title

Ms

First name

Lisa

Last name

Rowe

Organisation

British Film Institute

Your representation

Please complete this set of questions for each representation you wish to make.

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

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED7

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not consistent with national policy

Policy ED7 makes reference to types of retail centres including town centres, major centres, district centres, local centres and the CAZ Retail Clusters. The Policy states at clause a) that the Council will support the vitality and viability of Lambeth's hierarchy of major, district and local centres, and Central Activities Zone retail clusters frontage, by: i) supporting retail, service, leisure, recreation and other appropriate uses in these areas.

However, clause c) only refers to development in town centres, with no reference to the CAZ Retail Clusters. This is not reflected in the supporting text which makes it clear that in the Central Activities Zone (CAZ) proposals for retail, service, leisure, recreation and other appropriate uses should be focussed on the identified CAZ retail clusters and the Lower Marsh/The Cut/Leake Street Special Policy Area.

BFI therefore considers that Policy ED7 is not sound as it does not comply with national policy (NPPF para 85) which requires that:

"planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;..."

As currently drafted Policy ED7 is also not effective as it is inconsistent with its supporting text in relation to the status of the CAZ Retail Clusters, thus creating uncertainty in terms of the application of the relevant policies.

The policy could be made sound by providing more clarity on its definitions. The following underlined changes should be made to Policy ED7 clause c) to make it sound:

“Development in town centres and the CAZ Retail Clusters will be supported if ...”

This would ensure that CAZ Retail Clusters have the same status as a town centre which is implied by the policy and its supporting text, but the policy wording is not consistent in terms of its terminology and thus not in accordance with national planning policy.

It is important that the Policy is clear and unambiguous to enable proposals to come forward for major retail, service, leisure, recreation and other appropriate town centre uses within CAZ Retail Clusters, which is the overall aim of the policy. It would also ensure consistency with Policy PN1 clause (c) which provides for optimising the potential of Waterloo and the South Bank for a full range of central London and town centre activities consistent with the CAZ retail cluster.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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 above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

see comments above

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.

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If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, 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.

Please outline why you would like to participate at the oral examination

BFI wishes to participate in the discussion at the examination and respond to relevant matters and issues raised by the Inspector and other participants.

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.

Your representation 2

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED8

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not consistent with national policy

Clause a) of Policy ED8 states that:

"Evening and food and drink uses should be primarily located in town centres and Central Activities Zone retail clusters in accordance with the requirements in the Places and Neighbourhoods policies in Section 11."

There is no reference in the policy to the contribution made by the evening economy in the Strategic Cultural Area, although elsewhere in the Submission Plan at para. 11.10 that "the South Bank is also identified as having a night-time economy of international or national significance in the London Plan..." Policy PN1 clause (g) also acknowledges that "... the combination of the riverfront, streetscapes, piazzas, squares and green spaces contribute to the broader public realm and are places for people to meet, socialise, activate and dwell as well as move through. Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events..."

As currently drafted Policy ED8 is not sound on the basis that it is inconsistent with national planning policy that requires at para 11 a) that "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;"

As currently drafted Policy ED8 is also not effective as it is inconsistent with other parts of the Plan in relation to the contribution that the evening economy makes to the South Bank, thus creating uncertainty in terms of the application of the relevant policies.

BFI considers that Policy ED8 could meet the para 11 test and thus be made sound by including reference to the recognised positive contribution that the evening economy makes to the South Bank and, subject to cross reference with Policy ED13, Policy ED8 should be amended to ensure evening and

food and drink uses are also encouraged within the South Bank/Bankside Strategic Cultural Area.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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(optional)

see comments above

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If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, 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.

Please outline why you would like to participate at the oral examination

BFI wishes to participate in the discussion at the examination and respond to relevant matters and issues raised by the Inspector and other participants.

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Your representation 3

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED13 (c)

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

BFI supports Policy ED13 including clause (c) which seeks the replacement of lost cultural facilities

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, 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

Your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

Your representation 4

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED13 (d)

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not consistent with national policy

Policy ED13 (d) states that: "Commercial development related to cultural facilities on the South Bank and in Waterloo will be supported where it is associated with arts and cultural uses or is ancillary and complementary to the arts and cultural uses and where it can be demonstrated that:

"(i) it is essential to the development and/or the retention of arts and cultural facilities;

(ii) it would not undermine the primary character and function of the South Bank as an arts and cultural quarter; and

(iii) any enabling development supports and enhances the function and role of the arts or cultural facility that is proposing the development"

The supporting text at para 6.93 states that:

"...A reasonable proportion of restaurant and café uses will be considered enabling development that supports the function and role of arts and cultural uses ..."

Policy ED13 is a continuation of the policy in the Local Plan that has sought to restrict non-cultural uses in the South Bank to being ancillary to the cultural function of the area. Whilst BFI would not wish to see a dilution of this function, BFI considers there is an opportunity to create more flexibility in this policy which in turn would assist in maintaining and enhancing the cultural offer.

There is inconsistency between the provisions of Policy ED13 and the provisions of Policy PN1 and its supporting text which recognises at para 11.10 that "the South Bank is also identified as having a night-time economy of international or national significance in the London Plan...."

Policy PN1 clause (g) also acknowledges that "... the combination of the riverfront, streetscapes, piazzas, squares and green spaces contribute to the

broader public realm and are places for people to meet, socialise, activate and dwell as well as move through. Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events...”

As currently drafted Policy ED13 is not sound on the basis that it is inconsistent with national planning policy that requires at para 11 a) that “plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;”

As currently drafted Policy ED13 is also not effective as it is inconsistent with other parts of the Plan in relation to the recognised positive contribution that the evening economy makes to the South Bank, thus creating uncertainty in terms of the application of the policy.

BFI considers that Policy ED13 should be amended to recognise the contribution made by the evening economy and food and drink uses as well as other uses which are complementary to the to the function of the Strategic Cultural Area, with greater flexibility included in the policy to enable developments for these uses which are complementary to the function of the area as an international cultural and tourist destination. It is considered the policy does not reflect the changing nature of the South Bank cultural area, and its designation as a Strategic Cultural Area, where the evening economy and food and drinks uses are complementary to the cultural function of the area and in turn drive footfall to create a vibrant and viable destination, which in turn enhances the South Bank’s very special character and function as one of London’s leading cultural and tourist destinations.

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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 above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

see comments above

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- 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.

Please outline why you would like to participate at the oral examination

BFI wishes to participate in the discussion at the examination and be in a position to respond to matters and issues raised by the Inspector and other participants

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.

Your representation 5

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy Q26 and Annex 11

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not effective

BFI notes the provisions of Policy Q26 and its supporting text and makes specific representations in respect of the associated Annex 11 below.

BFI notes the reference in Policy Q26 to a forthcoming Site Allocations DPD which may identify further sites for tall buildings.

Annex 11 includes locations for tall buildings in Waterloo, Vauxhall and Brixton.

The identified sites within Waterloo includes W3 Waterloo Roundabout. This replaces the previous W3 IMAX. W3 is identified for a building of 130m (BFI notes the subsequent addendum confirming the published 30m is an incorrect reference).

The implication of Annex 11 is that the IMAX could be redeveloped as part of a development of the Waterloo Roundabout site and that the site could take a building of 130m.

BFI has commented elsewhere in relation to Policy PN1 in respect of any proposed redevelopment of the Waterloo Roundabout site. These comments equally apply to the proposals contained within Annex 11 in relation to the identification of a tall building on the Waterloo Roundabout site.

In respect of any redevelopment proposals for the Waterloo Roundabout site the BFI's primary objective will be to retain and enhance BFI's cultural presence on the site in the context of the importance of the IMAX as a key cultural destination in this location and the contribution it makes to the Strategic Cultural Area and to the functioning of BFI in delivering its cultural programme at BFI Southbank and beyond.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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 above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

see comments above and in relation to Policy PN1

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If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, 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.

Please outline why you would like to participate at the oral examination

BFI wishes to participate in the the discussion at the examination to respond to matters and issues raised by the Inspector and other participants in relation to Policy Q26 and its associated Annex 11.

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.

Your representation 6

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
 No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
 Policy number
 Policies Map - map and/or table number

Please state policy number

Policy PN1

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
 No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
 No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
 It is unsound because it is not justified
 It is unsound because it is not effective
 It is unsound because it is not consistent with national policy

Please state why it is not effective

BFI is generally supportive of Policy PN1 which sets out the provisions for development of Waterloo and the South Bank and in particular seeks to promote, amongst other objectives:

- Central London and town centre activities in the CAZ Retail Cluster
- Expansion of creative, arts and cultural facilities to enhance the South Bank
- Uses and places that encourage people to meet, socialise, activate and dwell

In particular BFI supports the provision in Policy PN1 (c) for optimising the area's potential for a full range of Central London and town centre activities consistent with the CAZ Retail Cluster, thus enabling the delivery of a wider range of uses which are complementary to the Waterloo and South Bank area, thus increasing footfall and viability and vitality in the area.

BFI also supports the provision in Policy PN1 (f) for the expansion of creative, arts and cultural facilities to enhance the South Bank. This aligns with one of BFI's central objectives which is to maintain and enhance BFI's cultural offer on the BFI Southbank estate, including IMAX.

BFI also supports the provision in Policy PN1 (g) recognising:

"... the combination of the riverfront, streetscapes, piazzas, squares and green spaces contribute to the broader public realm and are places for people to meet, socialise, activate and dwell as well as move through. Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events..."

Para 11.10 also recognises that “the South Bank is also identified as having a night-time economy of international or national significance in the London Plan...”

BFI has thus commented elsewhere that Policies ED8 and ED13 should be amended to recognise the contribution made by the evening economy and food and drink uses as well as other uses that are complementary to the function of the Strategic Cultural Area, with greater flexibility included in the policies to enable developments for these uses which are complementary to the function of the area as an international cultural and tourist destination. BFI notes the provision at Policy PN1 (k) relating to the proposed reconfiguration of Waterloo roundabout and its potential for the development of CAZ uses appropriate to its location.

BFI is aware of the proposals for the Waterloo City Hub which it supports as this will provide an enhanced setting for the IMAX with a much-improved public realm and wider pedestrian accessibility.

BFI is also aware of the provisions of Policy Q26 and its associated Annex 11 which identifies the wider Waterloo Roundabout site (previously the IMAX site) for a tall building at 130m (Site W3). The Plan also indicates at para 10.148 that a future Site Allocations DPD may identify further site allocations including tall buildings, which it is assumed could include the wider Waterloo Roundabout site.

In regard to any future proposals for the Waterloo Roundabout site the BFI’s primary concern and statutory responsibility is the maintenance and enhancement of its existing cultural offer as part of the wider South Bank cultural hub which is supported by the Submission Plan, including in Policy PN1 and in the allocation of the South Bank and Bankside as a Strategic Cultural Area.

As lead body for film in the UK, BFI has been at the heart of the South Bank since the 1951 Festival of Britain. Its presence contributes substantially to, and, in turn, benefits greatly from being part of the internationally acclaimed South Bank cultural offer. The IMAX is integral to this, as well as being the most visible and important destination occupier on the Waterloo Roundabout site.

Maintaining and enhancing BFI’s cultural offer on the BFI Southbank estate, including IMAX, is one of BFI’s central objectives. The ongoing operation of the IMAX site is also critical to maintaining BFI’s wider operations.

This objective is fully supported by the London Plan, the Mayor’s Cultural Infrastructure Plan 2019, and in the Submission Plan at paras. 2.81 and 2.133 (where BFI Southbank is described as one of the key cultural facilities at the South Bank and the IMAX is described as a “well known cultural asset”). Waterloo and South Bank is recognised in the Submission Plan Spatial Vision for its: “cutting-edge culture and creativity, its access to the River Thames and to views of central London, and its international cultural and tourist destination on the South Bank”.

Strategic Objective F19 seeks to: “Support the delivery of Lambeth’s Creative and Digital Industries Strategy and maintain and develop Lambeth’s strength in arts and culture and the role of the South Bank as one of London’s leading international cultural and tourist destinations reflecting its status as part of the South Bank/Bankside Strategic Cultural Area.”

Policy ED13 also requires the re-provision of any cultural facility that is replaced or redeveloped, either on site or in the vicinity.

In the face of this clear policy support for maintaining and enhancing the internationally important cultural offer at the South Bank, any decision regarding the future of the IMAX cinema including its redevelopment or replacement, must be seen in the context of BFI’s plans to invest in the South Bank and improve its existing facilities, including IMAX, whilst maintaining its revenue streams.

As currently drafted Policy PN1 (k) (taken together with Policy Q26 and the associated Annex 11 which identifies the Waterloo Roundabout site as being suitable for a tall building), is unsound on the basis that it is not effective as it is inconsistent with other parts of Policy PN1 and other policies and provisions in the Plan which support the expansion of creative, arts and cultural facilities to enhance the South Bank Cultural Area and the importance of maintaining and enhancing the BFI cultural offer, including the IMAX.

To ensure consistency within the Plan, and to make it sound Policy PN1 needs to recognise the importance of the IMAX as a key cultural destination in this location and the contribution it makes to the Strategic Cultural Area and to the functioning of BFI in delivering its cultural programme at BFI Southbank and beyond.

Clause k) should therefore be amended to make reference to the on-going importance of retaining the IMAX in its current location or ensuring that any re-provision of a cultural facility on the site (as required by Policy ED13) fully meets BFI’s wider cultural and regeneration objectives including maintaining and enhancing BFI’s cultural offer on the BFI Southbank estate, including at the IMAX Waterloo Roundabout site.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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 above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

see comments above

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- 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.

Please outline why you would like to participate at the oral examination

BFI wishes to participate in discussions at the examination and be in a position to respond to matters and issues raised by the Inspector and other participants in relation to Policy PN1

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.

Your representation 7

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED7

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not effective

Policy ED7 makes reference to types of retail centres including town centres, major centres, district centres, local centres and the CAZ Retail Clusters. The Policy states at clause a) that the Council will support the vitality and viability of Lambeth's hierarchy of major, district and local centres, and Central Activities Zone retail clusters frontage, by: i) supporting retail, service, leisure, recreation and other appropriate uses in these areas.

However, clause c) only refers to development in town centres, with no reference to the CAZ Retail Clusters. This is not reflected in the supporting text which makes it clear that in the Central Activities Zone (CAZ) proposals for retail, service, leisure, recreation and other appropriate uses should be focussed on the identified CAZ retail clusters and the Lower Marsh/The Cut/Leake Street Special Policy Area.

BFI therefore considers that Policy ED7 is not sound as it does not comply with national policy (NPPF para 85) which requires that:

"planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;..."

As currently drafted Policy ED7 is also not effective as it is inconsistent with its supporting text in relation to the status of the CAZ Retail Clusters, thus creating uncertainty in terms of the application of the relevant policies.

The policy could be made sound by providing more clarity on its definitions. The following underlined changes should be made to Policy ED7 clause c) to make it sound:

“Development in town centres and the CAZ Retail Clusters will be supported if ...”

This would ensure that CAZ Retail Clusters have the same status as a town centre which is implied by the policy and its supporting text, but the policy wording is not consistent in terms of its terminology and thus not in accordance with national planning policy.

It is important that the Policy is clear and unambiguous to enable proposals to come forward for major retail, service, leisure, recreation and other appropriate town centre uses within CAZ Retail Clusters, which is the overall aim of the policy. It would also ensure consistency with Policy PN1 clause (c) which provides for optimising the potential of Waterloo and the South Bank for a full range of central London and town centre activities consistent with the CAZ retail cluster.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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 above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

see above comments

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.

If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, 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.

Please outline why you would like to participate at the oral examination

BFI wishes to participate in the discussions at the examination and be in a position to respond to matters and issues raised by the Inspector and other participants

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.

Your representation 8

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED8

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not effective

Clause a) of Policy ED8 states that:

"Evening and food and drink uses should be primarily located in town centres and Central Activities Zone retail clusters in accordance with the requirements in the Places and Neighbourhoods policies in Section 11."

There is no reference in the policy to the contribution made by the evening economy in the Strategic Cultural Area, although elsewhere in the Submission Plan at para. 11.10 that "the South Bank is also identified as having a night-time economy of international or national significance in the London Plan..." Policy PN1 clause (g) also acknowledges that "... the combination of the riverfront, streetscapes, piazzas, squares and green spaces contribute to the broader public realm and are places for people to meet, socialise, activate and dwell as well as move through. Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events..."

As currently drafted Policy ED8 is not sound on the basis that it is inconsistent with national planning policy that requires at para 11 a) that "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;"

As currently drafted Policy ED8 is also not effective as it is inconsistent with other parts of the Plan in relation to the contribution that the evening economy makes to the South Bank, thus creating uncertainty in terms of the application of the relevant policies.

BFI considers that Policy ED8 could meet the para 11 test and thus be made sound by including reference to the recognised positive contribution that the evening economy makes to the South Bank and, subject to cross reference with Policy ED13, Policy ED8 should be amended to ensure evening and

food and drink uses are also encouraged within the South Bank/Bankside Strategic Cultural Area.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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(optional)

see comments above

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Your representation

Please complete this set of questions for each representation you wish to make.

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

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

Policy ED13 (d)

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not effective

Policy ED13 (d) states that: "Commercial development related to cultural facilities on the South Bank and in Waterloo will be supported where it is associated with arts and cultural uses or is ancillary and complementary to the arts and cultural uses and where it can be demonstrated that:

"(i) it is essential to the development and/or the retention of arts and cultural facilities;

(ii) it would not undermine the primary character and function of the South Bank as an arts and cultural quarter; and

(iii) any enabling development supports and enhances the function and role of the arts or cultural facility that is proposing the development"

The supporting text at para 6.93 states that:

"...A reasonable proportion of restaurant and café uses will be considered enabling development that supports the function and role of arts and cultural uses ..."

Policy ED13 is a continuation of the policy in the Local Plan that has sought to restrict non-cultural uses in the South Bank to being ancillary to the cultural function of the area. Whilst BFI would not wish to see a dilution of this function, BFI considers there is an opportunity to create more flexibility in this policy which in turn would assist in maintaining and enhancing the cultural offer.

There is inconsistency between the provisions of Policy ED13 and the provisions of Policy PN1 and its supporting text which recognises at para 11.10 that "the South Bank is also identified as having a night-time economy of international or national significance in the London Plan...."

Policy PN1 clause (g) also acknowledges that "... the combination of the riverfront, streetscapes, piazzas, squares and green spaces contribute to the broader public realm and are places for people to meet, socialise, activate and dwell as well as move through. Development and uses should recognise and add value to this important asset through the inclusion of flexible places for people and events..."

As currently drafted Policy ED13 is not sound on the basis that it is inconsistent with national planning policy that requires at para 11 a) that "plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;"

As currently drafted Policy ED13 is also not effective as it is inconsistent with other parts of the Plan in relation to the recognised positive contribution that the evening economy makes to the South Bank, thus creating uncertainty in terms of the application of the policy.

BFI considers that Policy ED13 should be amended to recognise the contribution made by the evening economy and food and drink uses as well as other uses which are complementary to the to the function of the Strategic Cultural Area, with greater flexibility included in the policy to enable developments for these uses which are complementary to the function of the area as an international cultural and tourist destination. It is considered the policy does not reflect the changing nature of the South Bank cultural area, and its designation as a Strategic Cultural Area, where the evening economy and food and drinks uses are complementary to the cultural function of the area and in turn drive footfall to create a vibrant and viable destination, which in turn enhances the South Bank's very special character and function as one of London's leading cultural and tourist destinations.

Complies with the Duty to co-operate

Yes

No

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(optional)

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(optional)

see comments above

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Require further notification

Please tick relevant boxes if you require notification of any of the following to the address stated previously in personal/agent details

(optional)

- 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.

Review your answers

Review your answers

Before submitting your form you can review all of the answers you have given so far by clicking on the link below.

[Open a read only view of the answers you have given \(this will open in a new window\)](#)

Declaration

By submitting this claim you are agreeing to the following declaration. To view this declaration please click on the link below

I declare that the information I have provided on this form is accurate

Now submit your form using the submit button below.