Pre-Submission Publication Representation Form

Lambeth

Ref: **R032** (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*
** 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.*

2. Agent's details (if applicable)

	1. Personal details*	2. Agent's details (if applicable)
Title	Mr	
First name	MATTHEW	
Last name	CLARKE	
Job title†	Local resident	
Organisation†	Loughborough Junction Neighbourhood Forum	
Address	[redacted]	
Postcode	[redacted]	
Telephone	[redacted]	
Email†	[redacted]	

† where relevant

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Part B – please use a separate sheet for each representation

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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. 11.135 **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 attached pages for full reply
I attach as evidence letter from Lender of the Council

(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.

See attached pages for full reply

(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:

only if the Inspector requires this. Otherwise see the written submission

(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 Matthew Clarke **Date** 9/3/2020

on behalf of Loughborough Junction Neighbourhood Forum

From the Leader of the Council

Our Ref: **Leader/2019-05/012**

Anthea Masey, Ira Campbell, Nick Lewis & Matthew Clarke
c/o Loughborough Junction Action Group
25 Loughborough Park
London SW9 8TP

Thursday 23 May 2019

Lambeth

Dear Anthea, Ira, Nick and Matthew,

Thank you for your letter dated 18 April 2019, sent on behalf of LJAG, the Grove Adventure Playground, Marcus Lipton Youth Centre and the LJ Neighbourhood Forum, seeking clarification on commitments made about the future of the youth centre and adventure playground at the public meeting recently held following the tragic death of Glendon Spence.

I would like to take this opportunity to reiterate my recognition of, and strong support for, all the valuable work undertaken by Marcus Lipton Youth Centre and the Grove Adventure Playground that provide significant opportunities and improves the quality of life for many children, young people and their families in Loughborough Junction and the surrounding area.

I can confirm that the development proposals for the Grove Adventure Playground and Marcus Lipton Youth Centre, as contained in the draft Loughborough Junction Masterplan, will now no longer go ahead. Moreover, the development options on the Marcus Lipton, Grove Adventure Playground and Elam Street Open Space sites, are no longer being considered, and those sites will be protected for youth and play provision and enhancement as part of the masterplan.

Considering this change, I have already instructed officers, led by Sandra Roebuck (Director of Development, Planning and Housing), to prioritise a review of the masterplan in collaboration with the relevant Cabinet Members. Officers are also investigating the availability of relevant resources that can be invested in the area.

Sandra's team will be in contact to arrange a meeting with you in order to continue the conversation and agree a positive way forward.

Yours sincerely,

Councillor Jack Hopkins
Leader of Lambeth Council
jhopkins@lambeth.gov.uk

London Borough of Lambeth
Leader's Office
Lambeth Town Hall
Brixton Hill
London SW2 1RW

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Here is the section of the proposed Local Plan that is commented on here:

11.135. Assets designated as Assets of Community Value include the Green Man Skills Zone, Sunshine International Arts, Ebony Horse Club, The Platform, the Cambria public house and Grove Adventure Playground. The Marcus Lipton Youth Centre and the Grove Adventure Playground are particularly important to the Loughborough Junction area by providing supervised facilities and activities for children and young people. The adjacent Elam Open Space also provides essential local play facilities and requires enhancement as an open space for the local community.

from page 447 Loughborough Junction context and character

and:

b) The council will ensure an adequate supply of community facilities in the area to meet the need of local users, including supervised facilities for children and young people.

from page 453 of proposed PN10

.....

The Council had been consulting on a masterplan for the Loughborough Junction area. This was never finished due to dispute with local community over the proposed development by Lambeth Council of the land that the Marcus Lipton Youth Centre and Grove Adventure playground are on. This would have led to loss of the Grove Adventure Playground. The Council tried to put these proposals for redevelopment into the Masterplan.

After several years of argument and the successful re opening of the Grove Adventure Playground by the local community the Council backed down on the proposed redevelopment.

After the length of time that had elapsed the officers said that it was not feasible to finish the Loughborough Junction Masterplan. Officers did say the work done on the masterplan would feed into the Local Plan. This was after the letter from Council leader Jack Hopkins dated 23rd May 2019. So it was understood that the commitment the Leader made in the letter to protecting the Marcus Lipton, Grove APG and Elam Street Open Space would be incorporated in the Local Plan.

See here from officers:

"As stated in the letter from the Leader of the Council on 23 May 2019, it has been confirmed that the development proposals for the Grove Adventure Playground and Marcus Lipton Youth Centre, as contained in the draft Loughborough Junction Masterplan, will now no longer go ahead. Moreover, the development options on the Marcus Lipton, Grove Adventure Playground and Elam Street Open Space sites, are no longer being considered, and those sites will be protected for youth and play provision and enhancement.

It is proposed that the DRLLP PSV 2020 Policy PN10 will state 'the council will ensure an adequate supply of community facilities in the area to meet need for local users, including children and young people.'

It is proposed that the supporting text recognises the importance of the Marcus Lipton Youth Centre and the Grove Adventure Playground by stating 'The Marcus Lipton Youth Centre and the Grove Adventure Playground are particularly important to the Loughborough Junction area by providing facilities and activities for children and young people.'"

The letter from the Council leader says that the sites would be protected. However the proposed Local Plan only recognises the importance of these sites. It does not directly in the proposed Local Plan protect these sites for youth and play provision.

The Council argue that PN10 (b) is adequate to protect these sites . But all that does is state that an adequate supply of community facilities including supervised play are required in the area.

We had written to the Council to request the following alterations.

It is proposed that the DRLLP PSV 2020 Policy PN10 will state "the Council will ensure an adequate supply of community facilities in the area to meet the need of local users, including facilities for children and young people. **This will include adequate supply of supervised facilities for children and young people.**

It is proposed that the supporting text recognises the importance of the Marcus Lipton Youth Centre and the Grove Adventure Playground by stating " The Marcus Lipton Youth Centre and the Grove Adventure Playground are particularly important to the Loughborough Junction by providing supervised facilities and activities for children and young people.

Therefore the land these two facilities are on will be protected for provision of services to children and young people. This includes supervised play.

Further the adjacent Elam Open Space site will be protected for play provision and enhancement as an open space for the local community.

The alterations we requested are in bold.

The Council has altered the text to say supervised but does not in the proposed text add the two sentences above to protect the sites. The sites that the Leader of the Council promised in his letter would be protected.

The Council argue that the wording they use will protect the sites - Marcus Lipton, Grove adventure playground and Elam Open Space.

But saying adequate supply and recognising the importance is not the same as specifically protecting these sites as promised by the Leader of the Council.

It still leaves room for looking at redevelopment of these sites in the future as long as what the Council consider are adequate facilities placed elsewhere.

So we request the two sentences we have previously asked the Council to insert into the text are added to the Local Plan.

This would ensure what the Leader of the Council stated is put into practise in this Local Plan.

It would ensure the future of the sites.

Answer to question 4on the comment form about Soundness is 4.2 its not "Sound".

Following that answer to question 5 is 5.1 not positively prepared and 5.2 not effective

The strategy in the proposed entry for Loughborough Junction does not provide a minimum for supervised play and youth provision. The Grove Adventure Playground has, since its reopening, proven that there is a need for supervised play space. Playspace and space for youth services is also required to be protected in the Local Plan due to several large housing developments either agreed or in the pipeline. Which will lead to increase in local population and thus need for space for children and young people. Recent agreed planning applications for Hero of Switzerland and Peabody sites are high density developments with the bare minimum of playspace. They rely on local open spaces to deal with need for play space children and young people This is another reason why the specific sites that Grove APG/ Marcus Lipton Youth Centre/ Elam Open Space should be specifically protected in the Loughborough Junction entry. This would be an appropriate strategy for this area which is under pressure of development for housing.

The entry for Loughborough Junction is not appropriate strategy for supervised play and playspace for children.The success of the Grove Adventure Playground shows the importance of protecting specific sites for youth services and supervised play. Therefore the proposed entry for Loughborough Junction is not appropriate strategy. It does not go far enough to meet the needs of the area in present and future. It would be consistant with sustainable development to protect specific sites for youth and supervised play in Loughborough Junction entry in Local Plan.