

Tell us who you are

Ref: R037

Title

Mrs

First name

Paula

Surname

Carney

Email address

paula.carney@carneysweeney.co.uk

Agent's details

Are you an agent?

Yes

No

Title

Mrs

First name

Paula

Last name

Carney

Job title (optional)

Director

Organisation

CarneySweeney Limited

Address

77 Farringdon Road, London

Postcode

EC1M 3JU

Contact number

0208 138 5837

Email address (optional)

paula.carney@carneysweeney.co.uk

Representors details

Title

Mr

First name

Iain

Last name

Tuckett

Organisation

Coin Street Community Builders

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 paragraph number

2.11 and 2.65

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)

- Recognition that the number of older people in the borough is projected to rise; and
- Recognition that the number of those aged over 85 is expected to increase with consequential increases in age-related conditions and demand for care services. This includes some people with enduring mental health needs who will become part of the ageing population, with particular housing needs.

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 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 paragraph number

11.11 and 11.12

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)

- Whilst allowing for proper servicing of buildings and spaces, the need to reduce traffic in Waterloo;
- Measures to increase the ease of walking and cycling;
- The recognition that additional public realm is required to accommodate increases in pedestrian movements alongside improvements to the quality, permeability, accessibility and safety of public spaces;
- Interventions to improve air quality, pedestrian and cycle routes.

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 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 paragraph number

11.16

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)

- The recognition of parts of the area already being deficient in access to some categories of open space;
- The prioritisation of the effective management and maintenance of open spaces in Waterloo.

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 paragraph number

11.17

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)

- The recognition that development in the Waterloo area should incorporate design solutions that prevent or minimise exposure to air pollution and make provisions to address local air pollution.
- The recognition that improving air quality in the area is a priority for both the council and the neighbourhood plan.
- The commitment that new developments in the area will be expected to contribute to actively reducing air pollution and increase green infrastructure.
- The reference to the neighbourhood plan identifying a network of 'Greenways' which provide low pollution walking and cycling routes through the area.
- The commitment that in the Opportunity Area the council will apply the air quality positive approach in accordance with London Plan policy SI1.

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 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

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

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)

- The Council's commitment to supporting and enhancing the role of Waterloo as a mixed residential area with appropriate supporting community facilities.
- The Council's commitment to promoting a high quality, permeable, safe and accessible public realm that is durable, well designed and maintained to reinforce Waterloo's status as a world class place; and the reference to development and uses recognising and adding value to this important asset through the inclusion of flexible places for people and events, and actively contributing to the enhancement of the collective public realm and increasing the amount of green infrastructure in the area.
- The Council's commitment to reducing traffic and supporting better conditions for walking and cycling throughout Waterloo.
- The Council's support of measures to improve air quality, including the creation of 'greenways' which are located away from heavy traffic, air pollution and noise, together with measures to promote and enable zero emissions vehicles across the area, including the taxi fleet serving Waterloo Station.

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 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

Site 9 : ITV Centre & Gabriel's Wharf and page 355 diagram

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

- CSCB has started to work up proposals for a nursing home and public piazza (linking Upper Ground to the riverside) on Gabriel's Wharf and an enabling workspace development on Prince's Wharf. Accordingly, CSCB support the identification of this site for development.
- The diagram on page 355 accompanying the text for Site 9 shows a new pedestrian link from Upper Ground to the riverside between Prince's Wharf and any redevelopment of the former London Television Centre. This is strongly supported. Before ITV announced its decision not to proceed with its permitted development, CSCB and ITV had agreed a scheme to provide such a pedestrian link. This involved both parties designating land to provide a pedestrian route which gradually ramped up to the riverside walkway. The indicative plan is attached. It is essential to safeguard this route in the Local Plan so it secures the commitment of any purchaser of the former London Television site and is taken into account in design development. The new route to the riverside would address the priority given in many sections of the plan to walking and public realm improvements (Policies T2 a, Q6, PN1 g) and to the River (Policy T5 v, and Q24 a vii), together with many further relevant references in supporting text.
- However, we note that point viii of the supporting text still refers to the Council supporting development that facilitates and responds positively to the Garden Bridge and the location is also shown on the diagram at page 355.
- We therefore consider that point viii in its current form should be deleted and the location deleted from this diagram, as it is currently unsound in its current form by not being justified.
- Also, a clearer reference in the supporting text point iii on page 356 should be made as follows, in order to be positively prepared and effective:

- o (iii) improves pedestrian linkages between Upper Ground and Queen's Walk including between the former London Television Centre and Prince's Wharf.
- Before bringing forward proposals for a nursing home on Gabriel's Wharf, CSCB commissioned Laing Buisson to assess the need for such a facility. It then discussed the proposals with LB Lambeth, LB Southwark, and Guys & St Thomas's NHS Trust. These studies and discussions confirmed the need for a nursing home in this locality. Once initial proposals had been prepared by Stanton Williams, JLL Healthcare carried out a business planning exercise which led to a revision of the initial proposals. CSCB is keen to progress the proposals but:
 - o The nursing home requires both capital and ongoing revenue subsidy;
 - o This requires an enabling development on Prince's Wharf; and
 - o ITV holds a lease expiring in 2029 on Prince's Wharf.
- CSCB will seek to negotiate an early release of Prince's Wharf but seeks certainty in the new Lambeth Plan that the proposed development will be acceptable. This should be included in the Preferred Use section for Site 9 on page 355 of the Local Plan in order to be effective.
- Notwithstanding the above, we note that the London Borough of Lambeth is reviewing its site allocations and is intending to issue a draft Site Allocations DPD in due course. It is important that the Proposed Local Plan does not confuse and conflict with the detail in the Site Allocations DPD. As currently drafted, we believe that the Proposed Local Plan is likely to confuse and conflict. As such it is potentially unsound.

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)

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

CSCB are a key stakeholder, landowner and developer of the Waterloo/South Bank area. Site 9 is a key development site on this regionally and nationally important part of the river frontage.

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

PN1 9g - Paragraph 10.26 and 11.12

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 justified

There are a number of references to The Waterloo and South Bank Public Realm Framework 2019 at:

- Paragraph 10.26;
- Paragraph 11.12;
- Policy PN1 9g

Whilst the draft of this document was consulted on in 2019, a final copy has not been made available to view. In these circumstances, we must provisionally conclude that the plans policies are not sound as they have not been seen to be positively prepared and justified.

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)

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

CSCB is a key stakeholder, landowner and developer of Waterloo and South Bank area. It has sites that will be developed during the plan period.

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 Q26, Policy PN1 e)/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 justified

Annex 11 of the revised draft Lambeth Local Plan refers to a Tall Buildings study and reproduces the consultant's 'Waterloo tall buildings map'. Doon Street/Upper Ground is included as Location W2 and is referred to as having a general building height as 110m AOD point block.

The Doon Street PA1 scheme received planning permission in August 2008 (Planning permission ref. 05/03498/FUL). In giving that consent the Secretary of State took into account extensive rendered views which were subject to scrutiny at the inquiry, and approved development of a height of 144.3m AOD. Further permissions were issued by LB Lambeth in 2012 and 2015 for development at 144.3m AOD. In approving the development, the Secretary of State commented that whilst there is some harm to views this is not sufficiently great to justify, by itself, withholding planning permission. This planning permission has now been legally implemented. The comments on the Miller Hare AVRs in Annex 11 are not in accordance with the conclusions reached on views (based on AVRs created by Hayes Davidson) at the extensive S78 public inquiry.

The reference to 110m AOD max for this site in the Local Plan is thus confusing and is not supported by a full evidence base. It is therefore unsound, and not justified.

The height should be altered to the approved 144.3m AOD height and referred to as a site under construction at the time of the Local Plan production.

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)

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

CSCB is a key stakeholder, landowner and developer of Waterloo and South Bank area. CSCB's Doon Street site will be developed during the plan period.

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 9

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 paragraph number

1.23-1.27

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

CSCB further notes the references to the Duty to Co-operate in paras 1.23 - 1.27 of the draft Local Plan. Bernie Spain Gardens north lies in Lambeth but the borough boundary is immediately to its east. Major developments in both Lambeth and Southwark bring large numbers of new users. Resources to deal with the pressures on infrastructure should be maximised and coordinated between the boroughs. The Statement of Common Ground between Lambeth and Southwark mentions cross-border strategic planning issues including green infrastructure, but no specific actions are referred to. There is concern, therefore, that the plan is unsound in this regard by being ineffective.

It is considered that paragraphs 1.23 – 1.27 should specifically refer to infrastructure provision and how cross boundary effective delivery is to occur.

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)

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

CSCB is a key stakeholder, landowner and developer of Waterloo and South Bank area. It has sites that will be developed during the plan period, including Bernie Spain Gardens which will be re-landscaped and enhanced.

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 10

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 paragraph number

2.116

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 positively prepared

CSCB welcomes and supports the positive words in paragraph 2.116 about neighbourhood-based service delivery, of which CSCB's programmes are a prime example. However, it is noteworthy that although youth provision is among the many examples of community facilities identified in this paragraph, there is no specific provision or allocation identified for the Waterloo & South Bank. There is growing recognition that provision for youth has been neglected and that a holistic approach to knife crime and gangs is required. For this reason, the plan is currently unsound by not being positively prepared.

CSCB believes that a significant youth facility, cross-subsidised by commercial income, should be identified in the Plan.

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)

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.

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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

CSCB is a key stakeholder, landowner and developer of Waterloo and South Bank area, and being a part of the local community and has a keen interest in the forms of social infrastructure that are needed in the local area.

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.

This form allows up to 10 representations. If you wish to make more representations, please start another form.

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

ED1 and ED2

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 positively prepared

The amendments to Policies ED1 and ED2 in the Draft Revised Lambeth Local Plan Submission Version are welcomed in order to deliver flexible workspace and for affordable workspace. However, the most creative and successful spaces are not fitted out to some theoretical standard but take place in buildings that allow true flexibility and are of sufficient size to support communal events and facilities. Diversity is needed in the market. For this reason, the plan is currently unsound by not being positively prepared.

As a result, we consider that extra criteria should be added to these polices to encourage new and innovative forms of workspace to respond to a fast changing industry.

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)

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

CSCB is a key stakeholder, landowner and developer of Waterloo and South Bank area. It has sites that will be developed during the plan period. As a key member of the local community it has a keen interest in social and economic infrastructure which is needed in the area.

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

EN1, D3, D4 and S2 and the Infrastructure Delivery Plan

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 positively prepared

We note and support the comments in the above policies that in order to support growth in the borough, the council will safeguard and improve essential social, physical and green infrastructure and work in partnership with service providers to ensure the delivery of the additional infrastructure. Similarly for the comments that the council, where required and necessary, will co-produce co-operative local investment plans and local neighbourhood infrastructure delivery plans that identify, prioritise and cost projects to be delivered locally via agencies working in co-operation with the council or by the council itself; and that projects will be brought forward as appropriate and relevant in mitigating the direct impact of development through section 106 planning obligations or the council will retain funds on behalf of the community to deliver local neighbourhood facilities and improvements through the use of a neighbourhood funding element of CIL.

However, we are concerned that the Infrastructure Delivery Plan does not target and prioritise the right investment in the right projects and the right areas. Firstly, this is in order to support mixed communities (which are referred to as being supported in para 2.119, Strategic Objective E14, Policy D1 d, Policy H2 etc), particularly in the context of high land values in the north of the Borough, investment is required in the neighbourhood and in the community and we are concerned that the proceeds of development are being taken out of the local community, not re-invested in it. Secondly, this is in having regard to the overarching objectives, aims and commitments made in the Local Plan. For example, paragraphs 11.11, 11.12, 11.16, 11.17 and policies PN1, S2, D3 and D4 refer to the need to support walking, cycling, air quality, green space, public realm and social infrastructure but the same

priorities are not carried through into the Infrastructure Delivery Plan's schemes and commitments to delivery priorities.

The Plan needs to establish a clear link between expected developments, the CIL they generate, and what this CIL is used to fund. In the case of Waterloo and South Bank this means investing substantially more in the neighbourhood rather than simply extracting resources. This also includes a far higher investment in management and maintenance of the South Bank.

For example, the Coin Street estate includes Bernie Spain Gardens and the riverside walkway from the National Theatre to Sea Containers House. CSCB is responsible for the management and maintenance of this large and very heavily used area of South Bank public realm. Proposals for the re-landscaping of Bernie Spain Gardens north and the area between the riverside walkway and the former London Television Centre, including new paths, CCTV and lighting, and a bridge connection between the re-landscaped Gardens and Oxo courtyard received planning permission on 7th April 2019 (under ref. 19/00087/FUL).

The project responds to Strategic Objective 11 - 'Increase the quality of open space and multi-functional green infrastructure in Lambeth' and is a consequence of the intensity of use caused by continued major growth in Waterloo, South Bank and Bankside. Paragraphs 2.108 and 2.113 of the draft Local Plan refers to intense pressures on infrastructure over the next 15 years to support projected population and economic growth. Parks and open spaces are included in the infrastructure to be provided. Policy PN1 lists the neighbourhood's key roles and paragraph (g) seeks to promote "a high quality, permeable, safe and accessible public realm that is durable, well-designed and maintained to reinforce Waterloo's status as a world class place... 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 the amount of green infrastructure in the area."

Bernie Spain Gardens is listed in Annex 6 as a 'District & Local Open Space' and will undoubtedly serve the growing working, visitor, student, and resident populations. CSCB wishes to see a commitment in the Local Plan to supporting Bernie Spain Gardens to become the high quality public realm and green space fundamental to the growth envisaged for the neighbourhood in the draft Local Plan.

It is not at all clear why the 'Waterloo City Hub' has been prioritised for CIL investment in the Infrastructure Delivery Plan. It is not popular locally and now appears to be identified as a site for a tall development in Annex 11. There is absolutely no point in committing resources to this project if a developer is going to construct a large building on it.

Conversely, there is a growing recognition that provision for youth has been neglected and that a holistic approach to knife crime and gangs is required. CSCB believes that a significant youth facility, cross-subsidised by commercial income, should be identified in the Infrastructure Delivery Plan.

We therefore conclude that the plan is currently unsound by not being positively prepared, justified, effective or consistent with national policy.

The plan needs to be amended to include a programme of schemes and priorities that match with the spatial areas for greatest development and the overarching objectives and aims of the plan. These need to include prioritised investment in the provision of walking and cycling routes, public realm and greenspaces in the South Bank area together with management and maintenance, youth facilities and social infrastructure. Schemes to deliver support for the private car should not be prioritised, together with schemes that are not supported locally.

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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No - I do not wish to participate at the oral examination

Yes - I do wish to participate at the oral examination

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

CSCB is a key stakeholder, landowner and developer of Waterloo and South Bank area. It has sites that will be developed in the plan period. CSCB has a keen interest in the social, economic, public realm and transport infrastructure that is needed in the area.

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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

H8

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

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(optional)

Sound

- Yes
- No

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- 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 positively prepared

CSCB wishes to emphasise the importance of providing accommodation enabling older people in north Lambeth and north Southwark to remain near their friends and community when they need longer-term nursing care. Care is paid for by individual savings or by the state. Given land values in the area and the proposed CIL charge, the costs to an individual will be extremely high and affordable provision will be unlikely to be provided.

The plan acknowledges the ageing population and their needs for more care but there is the no policy clearly supporting the provision of accommodation for elderly people. As such the plan is currently unsound by way of not being positively prepared.

Policy H8 needs to be amended to include support for the provision of accommodation for the elderly and the allocation of site/s.

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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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

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.