

Pre-Submission Publication Representation Form



Ref:

R052

(for official use only)

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

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

Please return to: localplan@lambeth.gov.uk

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

by 11pm on 13th March 2020.

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

This form has two parts –

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

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

Part A

1. Personal details*

2. Agent's details (if applicable)

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

Title	<input type="text" value="C/O Mr"/>	<input type="text" value="Mr"/>
First name	<input type="text" value="Steve"/>	<input type="text" value="Andrew"/>
Last name	<input type="text" value="Dark"/>	<input type="text" value="Somerville"/>
Job title [†]	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation [†]	<input type="text" value="London Fire Commissioner"/>	<input type="text" value="Nexus Planning"/>
Address	<input type="text"/>	<input type="text" value="5th Floor, Thames Tower"/>
	<input type="text"/>	<input type="text" value="Station Road"/>
	<input type="text"/>	<input type="text" value="Reading"/>
	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="RG1 1LX"/>
Telephone	<input type="text"/>	<input type="text" value="0118 214 9340"/>
Email [†]	<input type="text"/>	<input type="text" value="a.somerville@nexusplanning.co.uk"/>

[†] where relevant

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Part B – please use a separate sheet for each representation

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

Paragraph no. Policy no. Policies Map

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

(please tick)

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

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

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

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

(please tick)

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

(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.

Please see enclosed statement

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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.

Please see enclosed statement

(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:

To fully articulate to the Inspector why policies of the draft Revised Local Plan fail the tests of soundness

(if required continue on the additional comments page attached)

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

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

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

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

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

Signature



Date

13 March 2020

Please use this section for any additional/continued comments

Please see enclosed statement

Planning Strategy and Policy Team

London Borough of Lambeth
1st Floor, Phoenix House
10 Wandsworth Road
London
SW8 2LL

Thames Valley

5th Floor,
Thames Tower,
Station Road,
Reading, RG1 1LX,

nexusplanning.co.uk

13 March 2020

Dear Sir / Madam

DRAFT REVISED LAMBETH LOCAL PLAN – PROPOSED SUBMISSION VERSION

On behalf of the London Fire Commissioner (**the LFC**) we write in response to the consultation on the Draft Revised Lambeth Local Plan – Proposed Submission Version (January 2020), under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

U+I Group PLC (**U+I**) is working in partnership with the LFC to deliver the redevelopment its former headquarters site at 8 Albert Embankment, including the former workshop building to the east of Lambeth High Street and land on the corner of Newport Street/Black Prince Road (**the Site**). As well as residential (including affordable) and commercial accommodation, the development will provide the LFC with a replacement fire station and a London Fire Brigade Museum.

The Council has resolved to grant planning permission and listed building consent for the mixed use redevelopment of the Site, and U+I and the LFC (as joint applicants) are progressing the completion of a s.106 legal agreement so that final approval can be issued.

U+I has submitted detailed representations to this consultation, which include matters relating to the Site's allocation, its KIBA designation and the appropriateness of tall buildings.

The LFC wishes to endorse these representations (that were shared with the LFC before submission), which should be fully taken into account by the Inspector in the examination of the draft Revised Lambeth Local Plan.

Nevertheless, the LFC also wishes to reserve its position to be able to participate in the Examination in relation to matters concerning KIBA Policy ED3, 8 Albert Embankment allocation Policy PN2 (Site 10) and tall building Policy Q26, as relevant to the soundness of the draft Local Plan and redevelopment of the Site.

Policy S1 Safeguarding existing social infrastructure

Policy S1 seeks to protect social infrastructure and community facilities across the borough – existing premises that are in such use and the land on which they are located.

A broad range of social infrastructure is identified, which includes fire and emergency services under the control of the LFC.

The policy text safeguards community premises, subject to three exceptions at paragraph b), of which only one need apply. The LFC submits that the exceptions at b ii) and b iii) should be expanded to explicitly refer to the particular circumstances of the LFC and perhaps other emergency services.

Whilst fire stations do provide a function with significant local benefit, the location of any fire station within a particular area is determined by strategic matters including response times, fire cover and other operational requirements, with the purpose of ensuring that the whole of London is properly covered.

With the LFC there may be instances where the closure of facilities on one site is to enable the improvement or consolidation of facilities on another site. However, this would be informed by the LFC's strategic emergency planning function to ensure London-wide resilience – improvements or consolidation may not be within the borough but elsewhere in London.

It is also relevant that the sale of any surplus sites by the LFC often provides much required funding for the continued development of fire-fighting and emergency facilities across London as a whole, not just at borough level.

In this context a fire station should not be considered in the same way as other community uses.

Therefore, for Policy S1 to be responsive (and effective) to the LFC's strategic London wide approach to managing its assets, the exceptions at b ii) and b iii) should be amended to:

- b ii) *"replacement facilities are proposed on or off site of equivalent or better functionality to serve the needs of the area, or for the emergency services an alternative use of the site is informed by their wider strategic objectives; or"*
- b iii) *"development of the site/premises for other uses, or with the inclusion of other uses, will enable the delivery of approved strategies for service improvements, including of the emergency services."*

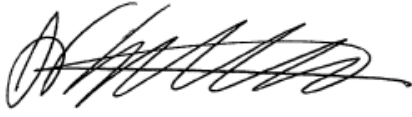
At paragraph c) of the policy text, for it to be consistent with paragraph b) above it should be amended to:

In exceptional circumstances, where tests (i) ~~and~~ or (iii) are not met; ~~and~~ or it is demonstrated to the satisfaction of the council that it would not be feasible and/or effective to include replacement facilities on or off site, or the reuse of a site is not informed by the wider strategic objectives of the emergency services in the proposed development; a payment in lieu may be accepted

Overall

We trust these representations will be provided to the Inspector for consideration as part of the Examination of the emerging Revised Lambeth Local Plan.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Somerville', written in a cursive style.

Andrew Somerville
Associate Director

cc London Fire Commissioner