

Tell us who you are

Ref: R065

Title

Ms

First name

Marilyn

Surname

Evers

Email address

[REDACTED]

Agent's details

Are you an agent?

☐ Yes

☒ No

Personal details

Title

Ms

First name

Marilyn

Last name

Evers

Job title (optional)

Organisation (optional)



Address



Postcode



Telephone



Email (optional)



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

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

I wish to make the following representations regarding Policy PN1. Policy PN1 has been completely rewritten since the previous stage of consultation, and is considered unsound. It is not positively prepared, justified or effective. Changes are proposed and I wish to appear at the Oral part of the Examination

PN1(h)

Jubilee Gardens is owned, managed and maintained by a small local charity, Jubilee Gardens Trust. The Gardens welcomes some seven million visitors each year. For many years the intention has been to extend Jubilee Gardens across the MOL designated area of the Hungerford Car Park. The remaining (non MOL) third of the HCP is designated for arts/cultural use.

Policy PN1 h) vi) is flawed and unsound.

In the statement:

Respect views from the Royal Festival Hall towards Jubilee Gardens, the London Eye and the Westminster World Heritage Site and from the Belvedere Road viaduct arch towards Jubilee Gardens,

delete and from the Belvedere Road viaduct arch towards Jubilee Gardens

In Changes to Policy Map Table 10 delete "visual draw and"

It is not clear which arch is the subject of this requirement. The view from one Belvedere Road viaduct arch towards Jubilee Gardens is substantially blocked by the ill-conceived, unsightly extension to the restaurant beneath the arch. On the south side of the arch the view is blocked by usage of the Hungerford site and the fact that the Gardens are at a higher level than the road. Also, the service road next to the arch carries frequent and large freight traffic to the arches serving the South Bank Centre.

The effect of this paragraph in the Local Plan is to set the front of a structure, built adjacent to the railway arches on the non MOL portion of the HCP, some distance back from Belvedere Road, leaving an area of MOL between the new building and Belvedere Road which is too small for recreation or relaxation, and potentially creating an area to the side of the new building which could be perceived as an out of the way corner attracting anti-social behaviour. It also reduces the useful area of the gardens by 10%, which means greater demands on the remainder.

The boundary of the proposed new building on the non MOL section of the HCP should extend to the boundary with Belvedere Road so that the boundary on the Queens Walk side will be pulled in to leave an area of MOL of a size equivalent to the area extended on the Belvedere Road edge. This will ensure better access to the extended Gardens from the Queens Walk and an extension of the main, useful fully integrated part of the Gardens.

During the period of public consultation on the Draft Local Plan the boundary between the MOL section of the HCP and a potential arts/cultural building on the non ML portion, remained as shown in the Local Plan of 2015. The now proposed boundary between arts building and MOL was introduced after the period for public consultations had ended and hence it has not been possible to raise concerns earlier. Further, it appears that the present detailed proposal is to suit the desires of a specific, possible arts use and development as opposed to any potential appropriate development. This is therefore unsound practice.

Also, note that the existing public toilets are not on the land leased to the Jubilee Gardens Trust and known as Jubilee Gardens. The WC building is on HCP land, therefore the statement in PN1(h), final sentence, that:

There should continue to be provision of public toilets in Jubilee Gardens.

must be amended to ensure it is accurate and does not lead to the presumption that those responsible for the management of Jubilee Gardens once extended across the Hungerford Car Park, must provide a public convenience/public loos. There can, therefore, be no such presumption.

Paragraphs (i) and (j), below, fail to refer to the considerable problem of coaches in the area, particularly Belvedere Road and Upper Ground. This is a serious omission. The area is too crowded and the roads too heavily used to allow for coach drop off, pick up or coach parking. A coach management policy must be enforced to ensure congestion of the area by coaches is eliminated

(i) Traffic management measures to deter unnecessary car trips and innovative measures to reduce the impact of freight and construction traffic will be promoted, including increased use of the River Thames and existing piers for transporting people and freight. Promotion of low and zero emissions vehicles will be a particular focus across the area.

(j) working with industry stakeholders to minimise the impact of construction activity in the area by planning and co-ordinating activities to reduce disruption, ensure safety, especially for vulnerable road users, and reduce environmental impacts.

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)

In the statement:

Respect views from the Royal Festival Hall towards Jubilee Gardens, the London Eye and the Westminster World Heritage Site and from the Belvedere Road viaduct arch towards Jubilee Gardens,

delete, and from the Belvedere Road viaduct arch towards Jubilee Gardens

In Changes to Policy Map Table 10 delete "visual draw and"

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

To make representations to ensure that the inaccuracies/flaws in the draft are acknowledged and corrected.

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

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.