

Tell us who you are

Ref: R072

Title

Mr

First name

Nic

Surname

Durston

Email address

nic.durston@southbanklondon.com

Agent's details

Are you an agent?

Yes

No

Personal details

Title

Mr

First name

Nic

Last name

Durston

Job title (optional)

Chief Executive

Organisation (optional)

South Bank Employers' Group

Address

Elizabeth House, 39 York Road, London

Postcode

SE1 7NQ

Telephone

07722415703

Email (optional)

nic.durston@southbanklondon.com

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

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

For the Local Plan to be Justified, it needs be an appropriate strategy, takes into account the reasonable alternatives, and is based on proportionate evidence. Paragraph 11.12 - in reference to highway/public realm capacity, improvements to the quality, permeability, accessibility and safety of public spaces - includes the statement that "The Waterloo and South Bank Public Realm Framework 2019 provides guidance on this". We contest that there is such a document as "The Waterloo and South Bank Public Realm Framework 2019" has not been finalised or issued, given that the consultation process relating to the production of the draft Waterloo and South Bank Public Realm Framework was met with several objections. Several local organisations, including South Bank Employers' Group, South Bank Business Improvement District, We Are Waterloo Business Improvement District, Bankside Open Spaces Trust, Jubilee Gardens Trust, Oasis, South Bank and Waterloo Neighbours, and Waterloo Community Development Group, worked together to submit a unified statement objecting to many aspect of the draft Public Realm Framework, including the brief to the consultants, the lack of community engagement, and the poor quality of the resulting work. Whilst a response to these objections was received several months after submission, we contend that the Framework has no status, and no reference to it should be made in the DRLLP PSV Jan 2020. As such, the DRLLP PSV 2020 is unsound because paragraph 11.12 is unsound, as it is not 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)

Reference to the Waterloo and South Bank Plan Public Realm Framework needs to be deleted from paragraph 11.12 of the DRLLP PSV Jan 2020.

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

Eight organisations (mentioned above) worked collaboratively to make a combined submission to the consultation held on the draft Waterloo and South Bank Public Realm Framework, and the detail of this submission needs to be explained further to support the assertion that the DRLLP PSV Jan 2020 is unsound on the basis that it is not justified due to the reference to the Waterloo and South Bank Public Realm Framework in paragraph 11.12.

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

PN1 g)

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

Policy PN1 g) is concerned with the promotion of "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". PN1 g) states 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, and actively contribute to the enhancement of the collective public realm and increase the amount of green infrastructure in the area". PN1 g) then concludes with the statement "See guidance in the Waterloo and South Bank Public Realm Framework."

For the reasons outlined in Representation 1, the reference to the Waterloo and South Bank Public Realm Framework in Policy PN1 g) is not justified and is it our contention that this document does not exist as the Framework has not been finalised nor published. It is our view that the Waterloo and South Bank Public Realm Framework remains a draft document, and a flawed one at that.

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)

We wish to see the reference to the Waterloo and South Bank Public Realm Framework be removed from Policy PN1 g) for the reasons outlined above, and therefore removed from the DRLLP PSV Jan 2020

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

As noted in Representation One, the submission made to the draft Waterloo and South Bank Public Realm Framework was made collaboratively and collectively by eight local organisations, and the details and rationale for this collective action needs to be explained at the oral examination stage

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 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

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.