

Tell us who you are

Ref: R083

Title

Mr

First name

Ben

Surname

Rymer

Email address

Agent's details

Are you an agent?

☐ Yes

☒ No

Personal details

Title

Mr

First name

Ben

Last name

Rymer

Job title (optional)

Organisation (optional)

Friends of Lambeth Libraries

Address

n/a

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 paragraph number

3.6

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

Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, is not legally compliant. Please be as precise as possible

3.6 seems to confirm that Lambeth does not intend to add to the existing estate of ten libraries in the Borough for at least the duration of the term of the DRLLP. This is in harmony with the Infrastructure Development Plan (IDP), which does not set out plans for any new libraries, or expansion of the existing library estate footprint, for at least the next five years, and potentially the entire duration covered of the IDP plan - some 34/35 years. FoLL believes that, given Lambeth's predicted annual population growth of ~1.5%, this will, within the next several years, mean that Lambeth is not able to fulfill its legal obligation to provide a "comprehensive and efficient" library service, as required by the Public Libraries and Museums Act 1964. The full requirement of the Act reads: "(1) It shall be the duty of every library authority to provide a comprehensive and efficient library service for all persons desiring to make use thereof . . . [defined as] those whose residence or place of work is within the library area of the authority or who are undergoing full-time education within that area."

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 consistent with national policy

At odds with the spirit and letter of National Libraries and Museums Act 1964.

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)

To avoid a breach of the "comprehensive and efficient" requirement, we consider that both the IDP and DRLLP must incorporate and bring forward plans for new library infrastructure, provided through a programme of capital investment, as part of the IDP. The rationale for this intent should, we believe, be incorporated in the main body of the DRLLP.

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 elucidate and elaborate on the evidence provided above. This is important as the 1964 act should be viewed and used in the context of related legal precedents, not least *Draper v Lincolnshire Council* [2014], *Bailey v London Borough of Brent* [2011] and *R (Green)v Gloucestershire City Council* [2011]), and these are best laid out, in our opinion, verbally in person, to avoid confusion and give context where needed.

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

S1

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

Two concerns regarding S1:

The proposed addition of the text at 'c)': "[i]n exceptional circumstances, where tests (i) and (iii) are not met and it is demonstrated to the satisfaction of the council that it would not be feasible and/or effective to include replacement facilities in the proposed development, a payment in lieu may be accepted."

Given the regular frequency of Lambeth's acceptance of in lieu payments - totalling some £10m in the most recent financial year - in place of the construction of required affordable housing, we consider that c) needlessly introduces risk into the provision of social infrastructure in the Borough. Lambeth needs more social infrastructure, not less, and the in lieu does not support this requirement, especially as Lambeth has made a regular habit of accepting in lieu payments.

We are also concerned by paragraph 7.8 in S1, specifically "A smaller quantity of floorspace may be acceptable where it is demonstrated to the satisfaction of the council that the new accommodation can be used more effectively." The shrinkage of Lambeth's library estate footprint in recent years - both through the closure of libraries and the reduction of library floorspace within retained library sites - means that a smaller quantity of floorspace as described for libraries is unlikely to be acceptable.

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)

Point S1/c should be expunged, and the text at 7.8 should make explicitly clear that library floorspace will not be sacrificed under all but the most pressing and unavoidable circumstances.

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

To elucidate and contextualise the points made here.

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

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

S2

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

Public libraries are barely represented in the section, despite being a service used (according to the Residents Survey 2014) by one in three Lambeth residents in a given year.

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 propose that “libraries” should be added to the list at S2/a, especially as the need to “promote social inclusion” - something libraries are especially well-placed to do - is acknowledged in several places elsewhere in the policy.

We consider that, in order to avoid breaching the “comprehensive and efficient” legislative requirement regarding libraries, the Council must strengthen and extend the language at S2 a from “[t]he council will also apply the provisions set out in London Plan policies S1, S2, S3 and S5, where relevant”, to “The council will also apply the provisions set out in London Plan policies S1, S2, S3 and S5 and, where relevant, go beyond the requirements of these provisions”. This is important as the Draft London Plan is notably weak in its requirements and recommendations regarding public library infrastructure. This means that Lambeth must, as well as adhering to the Draft London Plan’s requirements, move beyond them to be sure to avoid breaching the “comprehensive and efficient” obligation.

We propose the replacement of the existing text at Policy S2/c: “[d]evelopment proposals for more than 500 residential units should incorporate suitable childcare provision to meet additional need arising from the development that cannot be met by existing local facilities” be replaced with “Development proposals for more than 500 residential units should incorporate suitable childcare *and public library* provision to meet additional need arising from the development that cannot be met by existing local facilities.”

We propose that S2/e be strengthened to include public library provision. This is required as the Draft London Plan clause S4/b does not specifically mention libraries, which, again, requires Lambeth to be more explicit in its statements regarding intention to provide new library facilities.

S2/7.19 raises the same concern as S1/c, namely, that developers are given the opportunity to buy their way out of providing social infrastructure. Especially worrisome is the fact that in lieu contributions will be calculated “on a case by case basis”, meaning residents have no way of knowing how much will be yielded for social infrastructure should an in lieu payment be negotiated.

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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- ☒ 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

To elucidate and contextualise the comments and proposals above.

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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

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

7.3

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 paragraph states: "[t]he Infrastructure Delivery Plan provides a list of the relevant infrastructure strategies and programmes". However, the IDP does not state any plans for new library infrastructure over the term covered by the plan - some 35 years.

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)

The IDP should be amended to include additional library infrastructure to meet the needs of a growing population. The IDP should recognise the need for capex investment in new library sites, as well as ongoing opex investment for running costs. This should be set against the context that Lambeth had, for several decades, fifteen public libraries, as opposed to the ten that it currently possesses.

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

To contextualise and elucidate on the points and proposals made above.

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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 paragraph number

2.124

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

Libraries are not mentioned.

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)

Change proposed text to "Community, play and youth facilities, *libraries*, and meeting spaces are therefore an essential part of the social infrastructure required by neighbourhoods."

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

To contextualise and elucidate on the points and proposals made above.

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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 paragraph number

2.132

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

We consider that the paragraph should recognise the urgent importance of directing developer contributions generated through high-density, often tall buildings toward social infrastructure, critically including libraries. While the paragraph does mention the importance of "consideration of the impact on the surrounding area", this does not, in our opinion, go far enough in explicitly stating that developers contributions from dense, tall developments must *in all cases* be directed towards social infrastructure provision, *particularly public libraries*, which play a critical role in community cohesion, mental wellbeing, positive health outcomes across a range of areas, employability and skills, youth life chances, and other areas.

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)

Redraft to more explicitly recognise the requirement for dense, tall developments to provide social infrastructure such as libraries.

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

To contextualise and elucidate on the points and proposals made above.

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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

Infrastructure Development Plan (IDP)

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

The IDP omits any plans for public libraries over the forthcoming 35 year period, during which time Lambeth's population is set to grow by 1.5% each year. This will leave the Borough with fewer public libraries in 2054 than in 1984.

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)

Add additional plans to the IDP to expand the library estate to *at least* its former scope of fifteen public libraries over the 35 year term of the plan.

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

To contextualise and elucidate on the points and proposals made above.

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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

Topic Papers

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:

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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 effective

There is no Topic Paper for public libraries, a service used by one in three residents of the Borough.

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)

For future consultations, add a Topic Paper for libraries.

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

To contextualise and elucidate on the points and proposals made above.

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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.

Please correct the following errors

- Before you can move on and submit your form you must visit and complete all of the required sections up to this point. These sections are displayed in the list to the left. All of the sections without a tick next to their name require further action on your part.

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