

## Draft South Bank and Waterloo Neighbourhood Plan Regulation 16 Consultation Responses

This document provides a summary of representations received by London Borough of Lambeth and London Borough of Southwark during the publication of the draft South Bank and Waterloo Neighbourhood Plan. The draft neighbourhood plan was published in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) between 8 November and 20 December 2018. A total of 27 representations were received.

Reference	Respondent	Summary of representation
SoWN001	Openreach	<ul style="list-style-type: none"> <li>• Openreach policy on New Sites. We will deploy FTTP (Fibre To The Premise), free of charge, into all new housing developments of 30 or more homes, this new policy took affect for all New Sites registered from November 2016. This means that at least 9 out of 10 new build homes could have access to free FTTP infrastructure if property developers register their scheme and contract with Openreach.</li> <li>• Since we launched our new proposition for fibre broadband at new developments back in February 2016, we have reduced this threshold where we deploy FTTP for free. Initially it was free for developments of 250 homes or more, then in May 2016 we reduced it to 100 homes and from November 2016 it was reduced again to 30 homes. Meanwhile any developments with two or more homes will have access to our existing or planned fibre infrastructure, either funded entirely by Openreach or with the help of developer co-funding where that's needed.</li> <li>• For each new development, our dedicated New Sites Reception team will work with developers, and give a clear recommendation on the infrastructure that should be built. Once contracted, a dedicated field based coordinator will work with the Developer to lead them through the plan and build process.</li> <li>• We've reduced the free FTTP threshold to 30 or more homes to make it even easier for developers to have access to Ultrafast broadband. We know that consumers are passionate about the speed and reliability of the broadband service that their communication provider can offer them, and for some the availability of ultrafast speeds will strongly influence their decision on which new property to buy.</li> <li>• Openreach's FTTP infrastructure is open to all communication service providers and we're working hard with industry to encourage greater adoption, so customers have much wider choice and more customers can benefit from the faster speeds of up to 1Gbps this is ultrafast Broadband via FTTP, and not to be confused with FTTC (Fibre To The Cabinet) technology. This allows everyone in their homes to do whatever they want to do online. They can simultaneously stream 4K films and music, catch up on TV on demand, make HD video calls, play online games, upload photos and video clips to social media sites and send emails.</li> </ul>

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		<ul style="list-style-type: none"> <li>We therefore suggest and recommend that local authorities build a requirement into their local plans that FTTP is provided to all new build sites with an open access network – this guarantees not only fantastic broadband speeds but also great consumer choice.</li> </ul>
SoWN002	London Parks and Gardens Trust	<ul style="list-style-type: none"> <li>The LPGT is affiliated to The Gardens Trust (GT) which is a statutory consultee in respect of planning proposals affecting sites included in the Historic England (HE) Register of Parks and Gardens of Special Historic Interest. Inclusion of a site in the HE Register is a material consideration in determining a planning application. The LPGT is the county gardens trust for Greater London and makes observations on behalf of the GT in respect of registered sites, and may also comment on planning matters affecting other parks, gardens and green open spaces, especially when included in the LPGT's Inventory of Historic Spaces.</li> <li>Welcome the principle of neighbourhood planning and that local people are being given the opportunity to define their priorities within the planning system.</li> <li>Support in general, the proposed Green Infrastructure, Open Space and Air Quality proposals.</li> <li>Would have liked to have seen more detail around projects that protect the specific green spaces beyond Jubilee Gardens, with priorities for parks such as Ufford Street and Archbishop's Park and greater investment there with project details.</li> </ul>
SoWN003	National Grid	<ul style="list-style-type: none"> <li>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</li> <li>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</li> </ul>

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		<ul style="list-style-type: none"> <li>• National Grid has provided information in relation to electricity and transmission assets via the following internet link: <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></li> <li>• The electricity distribution operator in Lambeth Council is UK Power Networks. Information regarding the transmission and distribution network can be found at: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></li> <li>• Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.</li> </ul>
SoWN004	Historic England Archaeology	<ul style="list-style-type: none"> <li>• Having considered the current version of the above document, it appears that comments submitted by my colleague 18 October 2016 and those of myself 19 January 2017 may not have been responded to within the current submission.</li> <li>• I would therefore welcome comment as to how this document has been strengthened in respect of the historic environment and the archaeological potential.</li> </ul>
SoWN005	Historic England	<ul style="list-style-type: none"> <li>• The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest is affected by the Plan. As Historic England's remit is to advise on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.</li> <li>• The area covered by the proposed Neighbourhood Plan, as illustrated on the map and straddles the borough boundaries between Southwark and Lambeth. The area is large and encompasses areas of major growth and a complex range of heritage assets, including the setting of the Westminster World Heritage Site. We commented on the area boundary on 15 November 2013 and on the associated screening report on 18 October 2016, highlighting the opportunity to develop policies for heritage and character issues.</li> <li>• The Draft Plan does not specifically seek to address specific heritage issues, beyond noting the importance of heritage and local character.</li> <li>• The Draft Plan does not seek to identify specific heritage or character led policies. Given the extent and complexity of heritage assets and their settings encompassed we do consider this a missed opportunity to develop policies which would help embed local character and heritage within the future development of the area. However, we do not consider that the proposed policies create specific concerns in respect of having a negative impact on the historic environment and we do consider that the proposed Draft Plan should have broader beneficial impacts in terms of</li> </ul>

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		<p>promoting a healthy environment through its six key aims as set out on page 13. With this in mind we are content that the draft plan is in general conformity with local and national policy and the “Basic Conditions”.</p> <ul style="list-style-type: none"> <li>• In the event of the plan being approved we would continue to encourage the Neighbourhood Forum to consider developing a positive strategy for the historic environment and how new development can contribute to preserving and enhancing local historic character.</li> </ul>
SoWN006	Natural England	<ul style="list-style-type: none"> <li>• Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</li> <li>• Natural England does not have any specific comments on this draft neighbourhood plan.</li> <li>• If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</li> </ul>
SoWN007	Theatres Trust	<ul style="list-style-type: none"> <li>• The Theatres Trust is the national advisory public body for theatres. We were established through the Theatres Trust Act 1976 'to promote the better protection of theatres' and provide statutory planning advice on theatre buildings and theatre use in England through The Town and Country Planning (Development Management Procedure) (England) Order 2015, requiring the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre'.</li> <li>• The neighbourhood plan area is home to a number of theatres of various scales along with other arts, cultural and performance venues. This includes internationally renowned theatres such as National Theatre, the Grade I listed Southbank Centre and the Grade II* listed Old Vic as well as the Young Vic, Network Theatre, The Vaults Theatre and Waterloo East Theatre. Therefore the Trust has a great interest in this Plan.</li> <li>• 7.12 Thematic Objectives - We support the Plan’s objective of ‘Developing local access to culture in all its forms’, and it support for a range of facilities for the use of the community. On ‘Planning gain and mitigation’, this provides an opportunity to ensure existing and valued cultural facilities are protected from negative impacts on their operation arising from new development in line with the ‘Agent of Change’ principle described in paragraph 182 of the NPPF (2018) and Policy D12 of the emerging London Plan (2017).</li> <li>• Policy P17 - We welcome the Plan’s support for Leake Street and the Waterloo Station undercrofts, which includes fringe theatre (The Vaults Theatre and Network Theatre), and the aspiration to see such uses continue. Theatres such as these help contribute towards the Plan’s objectives of developing local access to culture, as well as fostering</li> </ul>

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		<p>innovation, developing talent and encouraging people into the area which has positive benefits for other local businesses.</p> <ul style="list-style-type: none"> <li>• Social infrastructure &amp; culture: Other guidance - We welcome the Plan's support for temporary installations along the South Bank to be permitted without delay. As well as exhibitions, markets and food and drink, the area hosts live performance and theatre such as Underbelly. We would support a Neighbourhood Development Order to that effect, although we would caution that such an Order should be drafted in such a way as to avoid being manipulated and to protect the setting of significant architectural and heritage assets from longer-term obstruction. We also appreciate and welcome the flexibility afforded to cultural activity through part 9, which if enforced arbitrarily could be counter-productive to the Plan's aims.</li> </ul>
SoWN008	Port of London Authority	<ul style="list-style-type: none"> <li>• For information, the PLA is the Statutory Harbour Authority for the Tidal Thames between Teddington and the Thames Estuary. Its statutory functions include responsibility for conservancy, dredging, maintaining the public navigation and controlling vessel movement's and its consent is required for the carrying out of all works and dredging in the river and the provision of moorings. The PLAs functions also include for the promotion of the use of the river as an important strategic transport corridor to London.</li> <li>• I have now had the opportunity to review the consultation documents and broadly support the production of the neighbourhood plan for the area but do have the following comments to make.</li> <li>• It is noted that the plan includes a number of thematic objectives, including specific objectives on ensuring reductions in air pollution, noise pollution and other negative effects, encouraging sustainable transport and reducing vehicular traffic throughout the neighbourhood. Whilst the PLA broadly support these objectives, it is considered that the plan should include more encouragement of the use of the River Thames for the transportation of passengers and freight, particularly small scale freight where viable. This would be in line with the PLA's Vision for the Tidal Thames (2016) (The Thames Vision) which includes a number of goals to increase activity on the river, including the goal to see double the number of people travelling by river – reaching 20 million commuter and tourist trips every year by 2035.</li> <li>• With regards to this is noted that the Neighbourhood Plan area contains the Festival Pier riverbus Stop, as well as Millennium Pier at the London Eye and Lambeth Pier to the South of the Neighbourhood Plan area. The PLA would encourage the greater promotion of these piers within the Neighbourhood Plan, particularly the riverbus stops, which can help to achieve the boroughs sustainable travel goals with regard to improving air quality and decreasing road congestion.</li> <li>• It is noted within the plan that the River Thames and riverside areas are recognised as valuable open space assets, particularly as an important walkway through the area, which is welcomed. Under appendix 10 of the document is a</li> </ul>

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		<p>list of 'greenway' routes which includes the Thames Path. The PLA supports the promotion of these routes within the plan, but considers that the Thames Path itself should be specifically quoted. The PLAs Thames Vision includes the goal to join up the Thames Path from source to sea and seeks to support keeping the Thames Path well maintained and accessible, particularly through new developments close to the river to ensure the Thames Path is retained as well as the access routes to it. In addition, as part of future riverside developments the PLA considers it is important to ensure that appropriate riparian life saving equipment (such as grab chains, access ladders and life buoys) are provided, as well as suicide prevention measures in appropriate locations (such as CCTV and signage with information to access support), which is particularly important on and around the bridges over the Thames in the plan area. (Waterloo, Hungerford and Westminster). It is considered that reference this infrastructure should be included within the plan.</p> <ul style="list-style-type: none"> <li>• The PLA also considers that reference should also be given to the Illuminated River project, and the benefits that this project brings to the area, in terms of improvements to arts and culture and the overall public realm of the plan area.</li> </ul>
SoWN009	Individual	<ul style="list-style-type: none"> <li>• In response to your request for views on the draft SoWN Neighbourhood Plan, I fully support all elements of this plan. Lambeth Council should give it full endorsement and ensure that in its own Local Plan the SoWN plan is given full weight.</li> </ul>
SoWN010	Thames Water	<ul style="list-style-type: none"> <li>• Thames Water is the statutory water and sewerage undertaker for the area and is hence a "specific consultation body" in accordance with the Town &amp; Country Planning (Local Development) Regulations 2012.</li> <li>• From the 1st April 2018 all network reinforcement work required to support development will be delivered by Thames Water and funded through the Infrastructure Charge applied to each property connected to the water and wastewater networks. The Infrastructure Charge will also cover all modelling and design work required to deliver any necessary upgrades. However, in most circumstances Thames Water will not commit to undertaking detailed modelling and design work until there is certainty of development coming forward. This is because without certainty of development coming forward the modelling and design work may be abortive. As a result of this change in approach, Thames Water will no longer require developers to fund impact studies or ask them to demonstrate, at the application stage, what infrastructure reinforcement works are required. However, it will still be critical that any necessary upgrades are delivered ahead of the occupation. As Thames Water cannot prevent connection of development to their networks, the planning system will still play a key role in assisting that development does not outpace the delivery of any necessary infrastructure provision. It is therefore important that developers engage with us at an early stage, pre-planning. In order to ensure that any necessary upgrades are delivered ahead of the</li> </ul>

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		<p>occupation of development, Thames Water are keen to work closely with Local Planning Authorities and Developers to understand the scale of development and the likely timescales for delivery. In this respect we would request that Local Planning Authorities encourage developers to contact Thames Water at an early stage [i.e. pre application submission] to provide details of their proposed development. Developers can make a pre-planning enquiry to Thames Water Developer Services at no cost to confirm whether or not there are capacity concerns. Previously there was a charge for this service but this is being removed to encourage its use. Where there are significant capacity concerns or developers have rapid programmes for delivery following the approval of planning permission, they may wish to underwrite Thames Waters costs for modelling and solution design work in advance of submitting planning applications. This would help ensure that any necessary infrastructure can be delivered more swiftly, following the grant of consent. Adopting this approach would provide developers and local authorities with greater certainty that any necessary infrastructure reinforcement can be delivered in line with proposed development programmes. In the event that permission is not granted Thames Water may seek to recoup aborted expenditure from developers.</p> <ul style="list-style-type: none"> <li>• The policy support for SuDS within the Neighbourhood Plan is welcomed. Within London the use of SuDS and reduction of surface water flows into the combined sewer network can help to create capacity within the existing sewerage network for growth without requiring upgrades to the sewerage network.</li> <li>• It will be essential that all development is aligned with any necessary water and sewerage infrastructure upgrades required to avoid any adverse impacts such as sewer flooding, pollution of land or watercourses and impacts of low/no water pressure. In line with adopted policies in the Lambeth Local Plan (Policy EN6) and Southwark Core Strategy (Strategic Policy 14) we would, where appropriate, request phasing conditions are used to ensure that any new development or phase of development is not occupied until any necessary upgrades have been completed.</li> <li>• To assist with aligning the delivery of any necessary water and wastewater infrastructure upgrades and minimising the need for planning conditions we would encourage developers to discuss their proposals and programmes with us prior to the submission of any application.</li> </ul>
SoWN011	Highways England	<ul style="list-style-type: none"> <li>• Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).</li> <li>• Having examined the above documents, we do not offer any comment to this proposal.</li> </ul>

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SoWN012	Southbank Centre	<ul style="list-style-type: none"> <li>• Southbank Centre is located within the Neighbourhood Plan Area and the 5.3-hectare site is one of the UK’s leading international cultural and tourist destinations. Southbank Centre is also one of the largest land owners within the area. It is within this context that Southbank Centre recognise the importance of the Neighbourhood Plan and welcomes the opportunity to comment on this important local planning policy document.</li> <li>• Southbank Centre is a world-famous, multi-venue arts centre providing a year-round arts and culture festivals and programming. The site includes the Grade I Royal Festival Hall, the Queen Elizabeth Hall, Purcell Room, Hayward Gallery and The National Poetry Library. The Southbank Centre’s wider estate also includes land at the Hungerford Car Park and land beneath the Waterloo Bridge/IMAX roundabout. Approximately 27 million people a year visit the site to experience the 5,000+ events that Southbank Centre host, featuring world-class artists from across the world. Southbank Centre employ approximately 500 people across a range of different professions and work in conjunction with over 1,000 artists on an annual basis. In addition to the core arts and cultural facilities, the site also comprises a number of complementary uses that contribute to this site as an international tourist destination, such as restaurants and shops.</li> <li>• As you will be aware, in addition to the ongoing programme of strategic maintenance and improvement, Southbank Centre work closely with LBL and local residents on the installation of temporary exhibits, structures and advertisements in support of the site’s arts and cultural uses. Southbank Centre have been successfully organising, hosting and managing Winter and Summer Festivals and Events annually since 2008. Southbank Centre continue to diversify and adapt their festivals, events and installations to maintain interest and excitement in arts and culture.</li> <li>• Southbank Centre are currently going through a period of change. Southbank Centre is welcoming a new Creative Director in January 2019 and the organisation is excited to embrace new opportunities and strategies that come with fresh perspectives. However, Southbank Centre is also in the process of reviewing their financial structure and implementing new funding strategies, in response to financial challenges including increased running costs, the decrease in public subsidies and recent large capital expenditures, such as the Festival Wing refurbishment. Southbank Centre is a registered charity and, whilst their short-term financial position is stable, funds are limited for inward investment and the ongoing maintenance of the important historic buildings. There are also diminishing opportunities to generate additional revenue and, as a result, Southbank Centre are investigating the potential of existing assets, such as the Hungerford Car Park and land beneath the Waterloo Bridge/IMAX roundabout. Notwithstanding the challenging financial environment, Southbank Centre are committed to their Core Values (Inclusive, Exciting, Welcoming, Fun and Innovative) and it is not intended to fundamentally change what the organisation is or what it offers. Southbank Centre are excited to implement a more focused programme of activities</li> </ul>

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		<p>and performances throughout the site, as well as a coherent site-wide strategy for high-quality public arts installation and major public art commissions. Southbank Centre also intend to respond to cultural changes with a stronger digital offer. Within the context of Southbank Centre’s current position and new strategies, we welcome the opportunity to comment on the important, emerging local planning policy document and the chance to continue our close relationship with the Neighbourhood Forum.</p> <ul style="list-style-type: none"> <li>• The South Bank and Waterloo Neighbourhood Plan recognises that Southbank Centre is one of the vital economic drivers within the area and the South Bank &amp; Waterloo Neighbours (SoWN) welcomes and encourages culture and tourism as a valuable part of South Bank life. It is also recognised that planning regulation is not always conducive to the delivery of an animated South Bank and temporary installations should be delivered without unnecessary impediment where they are in appropriate places. On this basis, it is explained that SoWN will consider promoting a Neighbourhood Development Order to support the temporary development of cultural or public art installations, incorporating strict guidelines developed in conjunction with neighbours to ensure noise levels, the duration and nature of the installation, and its location are acceptable.</li> <li>• The Neighbourhood Plan also recognises that consideration should be given to the balance between the economic benefits of tourism - and particularly how these benefits can be shared among a greater geographical and socioeconomic spread - and the impacts on the resident and business community of increased footfall, noise and disruption to quality of life / business as usual.</li> <li>• Projects which strengthen ties between communities of different social economic status are to be encouraged and developers should consider supporting local artists and cultural organisations when developing their cultural strategy, implementing public or internal art and procuring creative services. Local people and organisations should be consulted on public art and culture planned as part of development. Finally, temporary outdoor cultural activity which generates revenue should contribute to the maintenance of the public realm in the area immediately around the site. However, it is recognised that some cultural bodies’ funding models dictate that revenue-generating cultural activity contributes to core functions. In such cases, this may be considered ‘public benefit’.</li> <li>• On this basis, the Southbank Centre welcomes the general support provided for arts and cultural activities throughout the South Bank. The specific matters that Southbank Centre would like SoWN to give due consideration to comprise: <ul style="list-style-type: none"> <li>• Retention of Policy support to be given not just for development which promotes the expansion of the arts and cultural uses, but also development which enables the high-quality art and cultural activities to continue in the area;</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>• Enable Southbank Centre to develop a more diverse funding base through more innovative and creative ideas, preserve the existing facilities and maintain the same level of high-quality artistic and free programming which is core to Southbank Centre’s values;</li> <li>• Southbank Centre welcome SoWN’s proposal to promote a Neighbourhood Development Order that supports temporary development of cultural or public art installations and acknowledges the need to consider noise levels, the duration and nature of installations to ensure the neighbours’ amenity is retained;</li> <li>• Southbank Centre support the inclusion of guidance in relation to the delivery of temporary outdoor cultural activity and how this recognises that the revenue generated should contribute to the maintenance of the public realm in the area. Southbank Centre are continually seeking new ways to generate funds that can be reinvested into the maintenance of the buildings and public realm within the site and therefore are encouraged by the inclusion of this guidance since these maintenance costs continue to increase;</li> <li>• Southbank Centre are committed to bringing forward a new development on the part of the Hungerford Car Park that is not designated as Metropolitan Open Land. The plans are at an early stage and key principles of the redevelopment are not yet fixed. Southbank Centre are keen to ensure that the Policy Framework provided by the SoWN Plan enables these proposals to advance in accordance with the objectives of the Local Plan.</li> <li>• As an important stakeholder in the South Bank and Waterloo area, Southbank Centre are encouraged by the content of the South Bank &amp; Waterloo Neighbourhood Plan and would be pleased to continue engagement with South Bank &amp; Waterloo Neighbours going forward, as well as with officers.</li> </ul>
SoWN013	South Bank Employers Group and South Bank BID	<ul style="list-style-type: none"> <li>• SBEG was formed in 1991 as a not for profit company to represent the collective ambition of the main employers - businesses, cultural and arts organisations, social enterprises, statutory agencies, public institutions and infrastructure providers - on London’s South Bank. Following nearly 30 years of success in transforming the area, the ongoing commitment to SBEG reflects our members’ desire to see South Bank remain as one of the most culturally and economically dynamic parts of London and the UK. SBEG brings together a diverse group to achieve a shared vision - one that is based on collaboration, joint working and a firm commitment to those issues that matter to the local business and residential community - a quality public realm and environment, social amenities and facilities, and access to jobs, skills and training opportunities for residents of Lambeth and Southwark.</li> <li>• SBEG established South Bank BID in 2014 as a separate and stand-alone company, governed by a Board whose members are drawn from the business community. SBEG is the delivery agent for the BID and ensures that local services are coordinated and joined up to maximise benefits to all businesses and employers in the South Bank neighbourhood.</li> </ul>

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		<ul style="list-style-type: none"> <li>• SBEG is a vital part of South Bank life. Working with our members and partners, including South Bank BID and LB Lambeth, we provide and coordinate several key services and initiatives, which span security, cleaning, destination marketing and area promotion, employment and skills, and community engagement. SBEG members are internationally preeminent in their respective fields, and span the worlds of culture, property, tourism, hospitality, transport, education, health, commerce and community. Our members are vital to the very fabric of Lambeth's identity, and to the day to day life of its many communities. Our members are also critical to Lambeth's economic prosperity, and to the borough's future success. Both SBEG and South Bank BID work as part of South Bank Partnership, and are fully committed to addressing and achieving the priorities of the current South Bank Manifesto, published in March 2018, and its ambition for A Better South Bank for Everyone.</li> <li>• SBEG was an early advocate for a Neighbourhood Plan for the area, and saw the potential for an effective Neighbourhood Forum, which could build on the area's history of resident and business engagement, in shaping how this distinctive part of London could grow in the 21st century. SBEG committed time, finances and other resources to the process for getting the Plan underway and in getting South Bank &amp; Waterloo Neighbours (SoWN) established. SoWN was set up in 2012 as the formally designated Neighbourhood Forum for an area that encompasses nearly all of Bishop's ward. SoWN has led the process to produce neighbourhood development plan, under the 2011 Localism Act. It has 500 members and an annually elected steering group of around 30 people, representing various constituent groups, including businesses, residents, charities, community groups and ward councillors. As CEO of both SBEG and South Bank BID, I am a member of the SoWN Steering Group, effectively representing the most significant bodies of employers and businesses in the borough. SBEG was active in getting its members and other businesses in the area engaged in SoWN's consultation process on the first draft version of the Neighbourhood Plan. This took place in late 2016 and early 2017 and included providing updates at Board meetings, sharing responses, and in facilitating meetings and discussions with both the Chair and Secretary of SoWN. Several our members responded directly to that consultation, given their interest in and commitment to the Neighbourhood Plan and its policies. We provide regular updates to South Bank Partnership and South Bank Forum on the Neighbourhood Plan and its progress.</li> <li>• The Neighbourhood Plan comes at an important point in the development and growth of South Bank and Waterloo, and there are several relevant local and London-wide policies and strategies that will affect the area, its continued development and growth, and - given its importance and significance - its impact on the rest of Lambeth. This consultation comes at the same time as the review of Lambeth's Preliminary Draft Charging Schedule (PDCS) and Community Infrastructure Levy (CIL) rates/ LB Lambeth is also reviewing and consulting on a review of its draft Local Plan, its draft Transport Strategy, and its draft Infrastructure Plan. These are being undertaken in the context of the</li> </ul>

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		<p>preparation of the new London Plan, and the Examination in Public (EiP) which commences in January 2019. In addition, and of direct relevance to Lambeth’s consultation on its PDCS, CIL rates and its Local Plan, the Neighbourhood Plan is being reviewed in the context of the Mayor’s proposals for Mayoral Community Infrastructure Levy 2 (MCIL2) which has recently been through its own EiP process. LB Lambeth has recently published Creative Ways to Grow - its growth strategy for the creative and digital industries, which rightly identifies the South Bank and Waterloo area as an important hub for these important economic sectors. The Council is concluding its work on its Public Realm Delivery Framework for Bishop’s Ward and continues to progress its plans for a new Economic and Cultural Vision for the area. A consultation process on the Cooperative Local Investment Plan for the Waterloo area (Bishop’s Ward) was undertaken in 2017/18 although the results, and related priorities for Neighbourhood CIL, have yet to be made public.</p> <ul style="list-style-type: none"> <li>• SBEG and South Bank BID fully support the South Bank and Waterloo Neighbourhood Plan, and its policies. We believe that the Neighbourhood Plan and its policies will make a positive contribution to the area, if accepted by the Inspector and successful and referendum.</li> <li>• It is worth highlighting the references to the Neighbourhood Plan and to SoWN made in the 2018 South Bank Manifesto: South Bank and Waterloo Neighbours (SoWN) has been established and the Neighbourhood Plan has been developed following extensive community engagement (page 8 - Progress Report, Growth and Jobs). (We will) support the implementation of the Neighborhood Plan and its policies on green infrastructure, open space and air quality, and streetscape and transport (page 10 - The Environment and Public Realm). (We will) deepen collaboration between South Bank Partnership, South Bank Forum, and SoWN to represent all South Bank stakeholders, ensuring that the Partnership’s activities are conducted in a transparent manner (page 13 - Inclusivity). Take steps to engage proactively with residents and provide regular updates on progress towards implementing the Manifesto, through South Bank Forum and other groups that are active in the area, including SoWN.</li> <li>• Draft Policy P20 - We note the comments made in Cabinet Member Delegated Decision Report, dated 18 October 2018, regarding draft Policy 20. In the report, LB Lambeth officers state that: “2.23. Draft policy P20 seeks to influence the taking of CIL expenditure decisions. However, CIL expenditure decisions are not planning matters and those decisions must be taken by the Council in accordance with all relevant policies and procedures, and criteria, which govern expenditure decisions. In the view of officers, the inclusion of a policy about CIL spend in a neighbourhood development plan, which is a document prepared by a neighbourhood forum and not by the Council itself, would not amount to a fetter of the Council’s discretion when it comes to the taking of CIL expenditure decisions. However, that aside, from a planning policy perspective, officers continue to be of the view that as currently presented, draft Policy P20 does not amount to a policy in relation to the development and use of land.</li> </ul>

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		<p>2.24. The inclusion of draft Policy P20 is a matter that will need to be considered by the examiner in due course. 2.25. Notwithstanding officers' view in relation to draft Policy P20, the list of priorities for the spend of the neighbourhood element of CIL identified in the draft SoWN NDP has been fully considered and taken into account in the preparation of the emerging Waterloo CLIP. Conclusion regarding taking the draft plan forward to the next stage 2.26. In view of their assessment in relation to Policy P20, officers have considered whether the Council is obliged to reject the draft NDP at this stage. They have come to the view, on balance, that it is permissible to allow the draft plan to proceed to publication and examination. In reaching this view, they have taken the following points into consideration: (i) The appropriateness of the inclusion of draft Policy P20 as a neighbourhood plan policy will need to be considered by the examiner in due course. It is a matter about which representations can be made, including by the Council as local planning authority; (ii) Elements of the national policy guidance set out in the PPG (as noted above) - which is guidance, but which needs to be considered - can be said to be open to interpretation. Officers are not aware that the meaning of the relevant legislation, or the content of the PPG, has been addressed to date by the courts in relation to neighbourhood planning; (iii) The draft NDP is considered to be compliant with the other requirements that need to be considered at this stage, as listed in Appendix 6.</p> <ul style="list-style-type: none"> <li>• In respect of point 2.25, there is no evidence to support the statement that the list of priorities for the spend of the neighbourhood element of CIL identified in the draft SoWN NDP has been fully considered and taken into account in the preparation of the emerging Waterloo CLIP. No information on the Waterloo CLIP has been provided to SoWN or any other community or business network in the South Bank and Waterloo area. Furthermore, the Waterloo CLIP consultation process made no reference to the Neighbourhood Plan, and the amount of community engagement that has underpinned the process of its development and finalisation, over four years.</li> <li>• We don't accept the statement that Draft policy P20 seeks to influence the taking of CIL expenditure decisions. It is our understanding that SoWN has made it clear to LB Lambeth that it fully accepts that the Council must take the lead in determining how to spend CIL but is looking to ensure that it is involved in the process of deciding where neighbourhood CIL is allocated.</li> <li>• We note that the inclusion of draft Policy P20 is a matter that will need to be considered by the independent examiner in due course.</li> </ul>
SoWN014	Individual	<ul style="list-style-type: none"> <li>• I wanted to convey my support for adoption of this plan. It is the result of a lot of hard work by local people and has been extensively consulted upon.</li> <li>• It has been disappointing that Lambeth has been slow to deal with this plan and also unnecessarily carried out its own duplicate consultation.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>I fully support the plan and hope it will lead to better decisions and an improved environment. I also hope that Lambeth will fully co-operate with it.</li> </ul>
SoWN015	Guy's and St Thomas' Charity	<ul style="list-style-type: none"> <li>We write on behalf of Guy's and St Thomas' Charity who own a 5.4 acre site in the Waterloo Neighbourhood Plan Area, known as the Royal Street site.</li> <li>Established over 500 years ago, the Charity's purpose is to improve the health of people in the London boroughs of Lambeth and Southwark, two of the UK's most diverse and deprived areas. This is achieved through the Charity working with a range of partners to identify, test and scale new approaches to health and healthcare, and by supporting Guy's and St Thomas' NHS Foundation Trust through a combination of fundraising and the Charity's own philanthropic support. The Charity has an endowment of over £800m of assets which forms the backbone of its resources. A considerable part of this comprises the Charity's property portfolio, which includes significant land holding in the neighbourhood plan area.</li> <li>With regards to the development potential of the Royal Street site, the Charity are currently in the process of engaging with Lambeth Council through the Local Plan Process and via the pre-application process. The Charity are currently in the process of tendering for a development partner who will work in partnership with the Charity to deliver a development scheme onsite. The Charity are currently exploring options to optimise the site to deliver a mixed-use proposal.</li> <li>The Charity recognise the importance of the planning policy framework at both borough and neighbourhood level to help it and its partners realise their respective ambitions for growth and expansion. In large, the Charity are supportive of the Neighbourhood Plans approach and strategy for growth. However, there are some matters within the plan where we seek clarification on.</li> <li>The Charity is supportive of the Neighbourhood Plan's ambition to ensure that a range of genuinely affordable housing and affordable workspace is provided within the neighbourhood area. However, it is unclear within the supporting wording of the draft neighbourhood plan that the affordable housing policies (P7- P9) and affordable workspace (P14) are in accordance with the relevant policies in the Draft Lambeth Local Plan ( H2 Delivering Affordable Housing, and ED2 Affordable Workspace). We therefore seek clarification within the supporting text of the Neighbourhood Plan policies that the policies are consistent with the draft Local Plan policies and therefore not create additional burden or obligation on development sites on top of those set out in Lambeth spatial strategy.</li> <li>The Charity supports the principle of development providing the appropriate contributions to infrastructure and investment in the Neighbourhood Plan Area. Appropriate contributions will be provided through Community Infrastructure Levy (CIL) and S106 contributions. Regarding the specific aims to improve the Lower Marsh Market, we</li> </ul>

Reference	Respondent	Summary of representation
		<p>consider that the market will benefit from new homes and jobs in the area, increasing footfall and attracting people to the markets and stalls. This in turn should drive increased revenue which can be used to re-invest in the market. Therefore the Neighbourhood Plan's aims for growth will support the growth of existing businesses in the area and therefore CIL monies can be directed towards genuine infrastructure improvements required for the local area.</p>
SoWN016	Environment Agency	<ul style="list-style-type: none"> <li>• Thank you for consulting the Environment Agency on the above. Whilst we support the plan we would wish to see it aligning with the Environment Agency Thames Estuary 2100 (TE2100) Plan. It provides a plan for improving the tidal flood defence system for the period to 2100 so that current standards of flood protection are maintained or improved taking account of sea level rise. It should also seek to ensure that it reflects the riverside strategy concept and promote an integrated approach to riverside development that takes full account of future flood risk requirements and opportunities to provide wider environmental enhancements.</li> <li>• New development on sites adjoining the River Thames should manage tidal flood risk in accordance with the measures set out in the TE2100 plan. We acknowledge that the borough benefits from flood defences. However, there remains a residual risk of failure of these defences, and therefore it's essential that planning decisions are taken with due consideration to the scale of this risk. We would expect any planning applications in these areas to adhere to the requirements set out in the National Planning Policy Framework and the borough Strategic Flood Risk Assessment. Where the Neighbourhood planning area is in Flood Zone 2 or 3, or is in an area with critical drainage problems, advice on the scope of the flood risk assessment required should be sought from the Environment Agency. Where the area may be subject to other sources of flooding, it may be helpful to consult other bodies involved in flood risk management as appropriate.</li> <li>• We note that the plan area lies within the currently modelled areas at risk of residual flooding, assuming a breach in, or overtopping of the flood defences. We routinely request that applicants consider the outputs of our tidal River Thames upstream inundation modelling, where a site is located outside the extent of our tidal River Thames breach modelling, but located within the extent of our upstream inundation modelling. This is to ensure that the development can be appropriately assessed in terms of flood risk and the appropriate measures taken within the development to ensure the impact of flooding is minimal.</li> <li>• In all cases where new development is proposed, the sequential approach to locating development in areas of lower flood risk should still be applied within a neighbourhood planning area.</li> </ul>
SoWN017	Transport for London	<ul style="list-style-type: none"> <li>• We provide comments on draft local plans in respect of London Plan and Mayor's Transport Strategy (MTS) policy.</li> </ul>

Reference	Respondent	Summary of representation
	Spatial Planning	<ul style="list-style-type: none"> <li>• TfL's interests in the Neighbourhood Area (NA) are varied, and include: Waterloo London Underground (LU) station, one of the busiest in London; Westminster Bridge, Lambeth Palace Road, York Road and Stamford Street, which form part of the Transport for London Road Network (TLRN) and for which TfL is the highway authority; Waterloo Bridge, Westminster Bridge Road and Waterloo Road which for part of the Strategic Road Network (SRN) and for which TfL and the boroughs have a joint traffic management function; Numerous bus stops, served by a number of key central London bus routes; A number of Cycle Hire docking stations; Legible London signage; River services; Cycle and pedestrian safety to support the Mayor's 'Vision Zero' target of no killed or seriously injured (KSI) on London's roads by 2041</li> <li>• Generally, the transport-related policies in the draft South Bank and Waterloo Neighbourhood Plan (SBWNP) are supported, being in broad accordance with draft new London Plan (DLP) and MTS policy and direction of travel.</li> <li>• Specific comments are set out below, either where the draft Local Plan could be improved in respect of, or is at variance with, the DLP and MTS, or where specific wording would support determination of current major planning applications in the borough and/or TfL's statutory transport functions.</li> <li>• Policy P4 - This policy could go further and specifically support retention of existing and developer funding for the planting of new street trees. There have been examples of development proposals in the past in the NA that risked loss of mature street trees and TfL fought hard to resist. Mature street trees in the NA are particularly valuable, and some roads would benefit from new planting. Specific policy support in the NA to resist development that results in the loss of street trees, and to support developer contributions for new street trees, would therefore be welcomed (rather than a requirement simply 'to mitigate' any loss as per the current draft).</li> <li>• Specific mention of street tree planting in the 'projects table' on page 77 would be welcomed.</li> <li>• Policy P5b) - The policy to 'create an improved, pedestrian friendly streetscape, encouraging walking as the primary mode', and reference to 'TfL guidance' is supported. However, the policy and/or supporting text could be strengthened to reference the Mayor's Healthy Street Approach<sup>1</sup> and the expectation that developers will need to follow this approach in the design of public realm. Note that the benefits of this policy and of the Healthy Streets Approach are not restricted to air quality – there are safety, comfort, liveability and personal health benefits also.</li> <li>• Policy P5b) - Care must be taken not to discourage cycling – as some of the wording here seems to suggest - which could undermine this and other policies. Any pedestrian/cyclist conflict should be mitigated by good space design and/or provision of attractive alternative routes, rather than 'demonising' and restricting cyclist. The London Cycle Design Standards<sup>2</sup> should be followed in this respect.</li> <li>• Paragraph 4, p44 - This mentions the Cornwall Road bus garage as a 'strategic site allocation'. However, the draft 'partial review' Lambeth Local Plan that was recently consulted on deletes this site from the strategic site allocations</li> </ul>

Reference	Respondent	Summary of representation
		<p>list, so the draft NP should reflect this i.e. by deleting reference to the site here. The bus garage plays a vital role in supporting the central London bus network, in particular being the ‘home base’ for electric buses, which of course help improve air quality in the NA and elsewhere.</p> <ul style="list-style-type: none"> <li>• Section 8.2 - TfL would welcome policy support in the NP that requires development in the NA to contribute towards delivery of step-free access (SFA) to the Northern line and Bakerloo line northbound platforms at Waterloo LU station – these are the ‘missing step free links’ at this key interchange. The likely areas required for interventions to provide SFA lie under the ‘Elizabeth House’ site in York Road. We would welcome SFA at Waterloo LU station be included in the ‘projects table’ on page 77.</li> <li>• P18 - The requirement for Legible London signage provision for new development is supported. This policy/supporting text could be strengthened by specific mention of the need for public realm associated with new development to be designed in accordance with the Healthy Streets Approach, as per comment above.</li> <li>• Paragraph 1c, p63 - The statement ‘Rationalising buses and bus stops’ needs to be used with care. TfL is consulting on a review of central London bus services, which may result in changes to the local bus network, however the word ‘rationalisation’ suggests a reduction. Bus infrastructure capacity, particularly stops and stands, is often at a premium in the NA, as elsewhere in inner London, so this is unlikely to be supported by TfL.</li> <li>• Paragraph 1f, p63 - This states ‘Creating new walking routes through the area which separate pedestrians from motorised vehicles and, where possible, cyclists including alongside railway viaducts, under the station and through back streets’. Following on from the comment earlier, care is needed not to discourage cycling through ‘bans’, as this wording implies, as this will undermine other policies in the NP, as well as local and Mayoral policy.</li> <li>• Para 2, p63 - Support for developer-led ‘Healthy Streets’ improvements to York Road would be welcomed.</li> <li>• Appendix 9 - ‘Developer guidelines for the implementation of green infrastructure &amp; air quality infrastructure’. Any proposals for the TLRN will need to accord with TfL’s Streetscape Guidance. Design of public realm should follow the Healthy Streets Approach.</li> </ul>
SoWN018	HB Reavis UK	<ul style="list-style-type: none"> <li>• These representations to the examination version of the South Bank and Waterloo Neighbourhood Plan are submitted on behalf of our client HB Reavis UK Limited (“HB Reavis”). HB Reavis is an integrated pan-European developer operating in the United Kingdom, Poland, the Czech Republic, Slovakia and Hungary.</li> <li>• In 2017 HB Reavis acquired the Elizabeth House site at Waterloo. HB Reavis are now bringing forward a major commercial office scheme on the site, which will also deliver significant public realm improvements and works to alleviate capacity constraints at Waterloo Station. Both these objectives are identified as key issues within the Neighbourhood Plan.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Overall, HB Reavis supports the preparation of the Neighbourhood Plan document, and considers that the Plan meets the basic conditions at Paragraph 8 of Schedule 4B within the Town and Country Planning Act 1990 (as amended).</li> <li>• P4 - HB Reavis supports Policy P4, in particular Part A which, in recognition of the pressures on existing areas of public open space within the area, provides that all major developments should include amenity space designed for the exclusive use of the occupants, and that this should primarily be provided away from the ground floor, for example via green roofs and terraces. HB Reavis' proposals for Elizabeth House include extensive areas of roof terraces for use by the building's commercial occupiers, in order to enhance the quality of accommodation, and avoid placing further pressure on the network of existing open spaces within the Neighbourhood Plan area.</li> <li>• P5 - HB Reavis also supports Policy P5, which recognises that due to existing high levels of air pollution within the area, development proposals should show how they contribute to improving this situation through the incorporation of measures such as air filtration systems. In particular, HB Reavis also supports car free development within the Neighbourhood Plan area, and policy text which supports freight consolidation arrangements given the advantages these strategies have for tackling air pollution. HB Reavis' proposals for Elizabeth House include the incorporation of a partially consolidated delivery strategy, and we support the policy encouragement for other developments that bring forward the same.</li> <li>• P11 - HB Reavis wishes to comment on Policy P11, which provides that the facades of all new developments should be treated with a permanent anti-graffiti coating. Whilst graffiti (outside of designated areas such as Leake Street arches) is to be discouraged, we do not believe this requirement is a proportionate response to the issue. HBR suggests that instead, policy simply requires the design and management of new buildings to be resilient to the threat of graffiti as appropriate, particularly at ground level and areas lacking in natural surveillance, through the use of high quality and robust materials.</li> <li>• P14 - HB Reavis supports Policy P14, which states that schemes which provide office or workspace with certain characteristics, will be encouraged. HB Reavis supports the provision of buildings and workspaces that can be subdivided to encourage flexible use and co-working platforms, and those that include a range of unit sizes. HB Reavis also supports the provision of accommodation for a range of jobs that are accessible to local people and supports working with other providers and schools to provide work placements, apprenticeships etc.</li> <li>• P18 - HB Reavis supports Policy P18 which promotes the implementation of a legible London wayfinding system, where development creates new public realm at a scale which requires pedestrian way finding. In particular, HB Reavis' proposals for Elizabeth House include the creation of significant areas of new public realm adjacent to</li> </ul>

Reference	Respondent	Summary of representation
		Waterloo Station which will increase permeability across and through the site, and which will require appropriate signposting.
SoWN019	Transport for London Commercial Development	<ul style="list-style-type: none"> <li>• Please note that the following comments represent the views of TfL CD acting in TfLs capacity as a landowner and do not form part of any wider TfL statutory response. Our colleagues in TfL Spatial Planning may provide a separate response in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.</li> <li>• TfL CD is considering the opportunities for commercial and residential development in the vicinity of the IMAX roundabout in line with the adopted and Draft Lambeth Local Plans. We look forward to working collaboratively with the council and the neighbourhood forum to delivery development.</li> <li>• P1a - TfL CD understands the objective of this policy is to create and retain publicly accessible open space in the neighbourhood plan area. The policy focus should be on the quality of new open space created as part of developments instead of focusing solely on quantity.</li> </ul>
SoWN020	ITV Plc	<ul style="list-style-type: none"> <li>• National Planning Policy Framework - The NPPF, paragraphs 28 -30, notes that non-strategic policies should be set out by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. It is stated that: "Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies." The footnote to the paragraph states that Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.</li> <li>• Planning Practice Guidance, Neighbourhood planning - The PPG reiterates the advice in the NPPF and sets out advice as to the basic conditions that a draft neighbourhood plan must meet in order for it to proceed to referendum. These conditions include: "a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)." (PPG Paragraph 065 ID: 41-065-20140306). The PPG expands on the advice set out at paragraph 065 noting amongst others that a neighbourhood plan "...must not constrain the delivery of important nationalpolicy objectives."(paragraph 069 PPG), and that the neighbourhood plan "...must demonstrate how it</li> </ul>

Reference	Respondent	Summary of representation
		<p>contributes to improvements in environmental, economic and social conditions. "(paragraph 072 PPG). In order to demonstrate how a neighbourhood plan contributes to sustainable development, "...succinct and proportionate evidence should be presented on how the draft ...guides development to sustainable solutions. " (paragraph 072 PPG). Paragraph 074 PPG is particularly relevant to a consideration of the neighbourhood plan and whether it is in general conformity. It states as follows: "When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following: Whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with; The degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy; Whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy; The rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach.</p> <ul style="list-style-type: none"> <li>• As noted in their comments, dated 19<sup>th</sup> January 2017, to the pre-submission draft Plan, ITV is supportive of the principle of the Neighbourhood Plan and the integration of the community in the planning process.</li> <li>• It is important that the draft Plan is prepared having regard to the advice set out in the NPPF and PPG (part of which is summarised above) such that the strategic objectives for the area are not compromised.</li> <li>• The summary document "results of pre-submission consultation" sets out how the Examination Version has been prepared to respond to comments made in respect of the pre-submission document.</li> <li>• Green infrastructure, open space and air quality - The broad thrust of Policy P 1 is accepted i.e. the protection of existing publicly accessible open space.</li> <li>• In addition, whilst the wording of Policy P2 is imprecise -how is 'the intensification of the neighbourhood area' to be measured? the principle of major developments making contributions to improve existing or provide new open space, where feasible, is supported.</li> <li>• Policy P3 relates to Green Roofs. The desire to promote increases in green area is understood. How though is "an extensive green roof" defined? It is unclear how Policy P3b will operate in practice. It is unrealistic to require developers to identify existing buildings in the neighbourhood that could be retrofitted as green roofs. How is this to be controlled? Whilst the broad principle is accepted, the policy as currently worded is imprecise and unclear in the manner in which it is to be successfully implemented.</li> <li>• The wording of Policy P4 is too prescriptive. The use of the word "must" should be reconsidered. The criteria listed must be assessed having regard to the circumstances of each case and to require that the criteria are met is unreasonable. Reference is made at criterion P4c to guidance at Appendix 9. This sets out a formula for determining a</li> </ul>

Reference	Respondent	Summary of representation
		<p>compensation scheme payable towards green infrastructure projects in the area. If construction work is predicted to have an impact severe enough to prevent the reasonable enjoyment of any publicly accessible space the developer can be deemed to have taken it out of public use and so should in effect lease it at a rate of £1 per sq m per day. How is "an impact severe enough" to be measured? How is any funding from the scheme to be collected? What consideration has been given to the potential viability impacts of such a charge?</p> <ul style="list-style-type: none"> <li>• Can further clarity be provided regarding the wording of Policy P6? The first sentence is imprecise in what it requires. It is assumed that the policy applies to those sites that benefit from a planning permission for redevelopment, are already cleared of buildings but have yet to commence. In reality such sites will be few and far between especially in the conservation areas of the Plan area. The second sentence implies the desire for temporary uses relates to buildings as well as cleared sites. The policy should be flexibly applied. To require all major proposals to include construction and phasing plans for temporary uses may well prove counterproductive to the bringing forward of much needed long term sustainable development.</li> <li>• Housing - As set out at pre-submission stage, the provision of affordable housing must be assessed having regard to scheme viability and bearing in mind the clear guidance and advice at regional and local plan level. Policy P7 and P8 sets out support for specific types of affordable housing. This general and flexible approach is welcomed as it is impractical to be prescriptive as to the type of affordable housing to be sought on schemes of development.</li> <li>• It is unclear how Policy P9 will be successfully applied? If there is no land available in the neighbourhood area the policy cannot be met.</li> <li>• Development Management - The key issues identified at this section emphasise that developers are not always aware of the needs of the local community whilst the balance between affordable housing, density and other requirements is not always appropriate. The area has, it is said, exceeded targets for hotel uses to 2026. The two policies PIO and PI I fail to reflect all these key issues, in fact focusing almost exclusively on hotel uses.</li> <li>• Policy P10 seeks mitigation measures alongside any hotel proposal. The principle of seeking mitigation measures associated with development proposals is of course not unreasonable, so long as justified and reasonably necessary etc. It is though unclear why hotel use (and not others) is the focus of a development management policy. The London wide demand for visitor accommodation remains high and is essential to supporting its tourist function and the wider economic benefits that follow.</li> <li>• In the supporting text at this section (8.3 Development Management), point 4, reference is made to the strategic site allocations in the current Local Plans (Lambeth and Southwark). The neighbourhood forum seeks input to the elements/detail of the allocations. This particular guidance note seems unnecessary. There is an established process for consultation and review of site allocations through the Local Plan Review. Lambeth is currently undertaking a</li> </ul>

Reference	Respondent	Summary of representation
		<p>limited Review of its Plan and makes specific reference to the future consideration of site allocations. The neighbourhood forum, local community and other interested parties will all have the ability to comment and have their views taken into consideration through the further Review of the Local Plan.</p> <ul style="list-style-type: none"> <li>• Retail and work - The objective to secure office or workspace that provides for small scale I flexible use and in a range of unit sizes etc is understood (Policy P14). The policy is worded to "encourage" such schemes. This is appropriate. It would be unrealistic and unreasonable to require that such space is delivered associated with development proposals. The flexibility in the wording is welcomed as it acknowledges that such space will be provided where feasible/viable.</li> <li>• Streetscape and transport - The intent of Policy P 18 is supported. The provision of up to date wayfinding signage assists in making the area more attractive and accessible to workers, visitors and residents alike. Planning applications for redevelopment are the subject of S106 discussion in this respect which often will lead to an obligation to provide funding for improved signage. The wording of the policy should be further considered. What is I who is to define "public realm of a scale which requires"?</li> <li>• Policy &amp; guidance: planning gain and mitigation - The provision of S106 obligations associated with development is well established. Such obligations should only be sought where they are necessary, directly related to the development and; fairly and reasonably related in scale and kind. The term planning gain should be re-considered. Achieving the appropriate balance of S106 obligation and CIL contributions is important to ensuring that development is able to be brought forward to deliver economic and social benefits. Policy P19 and P20 need to be applied bearing in mind this context.</li> </ul>
SoWN021	Woodland Trust	<ul style="list-style-type: none"> <li>• Neighbourhood planning is an important mechanism for also embedding trees into local communities, as such we are very supportive of some of the policies set out in your plan.</li> <li>• The Woodland Trust is pleased to see that your Neighbourhood Plan identifies the important role that trees play, and that opportunities should be taken to increase tree cover in appropriate locations in South Bank and Waterloo. Trees are some of the most important features of your area for local people, and already this is being acknowledged with the adopted Lambeth Local Plan (2015), and how trees are important features which are worthy of protection. Policy Q10 identifies trees as being important features worthy of protection and it seeks to retain as many trees and other natural features as possible. Therefore, this should also be taken into account with the thematic objective for green infrastructure, open space and air quality, for your Neighbourhood Plan for South Bank and Waterloo, so that your plan seeks to preserve, protect and enhance your native landscape and mature trees and hedgerows.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• We are pleased to see that all of the Policies for Green infrastructure, open space and air quality do acknowledge the vital contribution of the natural environment in South Bank and Waterloo, and how your plan can assist with safeguarding this from encroachment. But this should also recognise the fact that development should not lead to loss or degradation of trees in your parish. Also, increasing the amount of trees in South Bank and Waterloo will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</li> <li>• Ancient woodland would benefit from strengthened protection building on the National Planning Policy Framework (NPPF). On 24th July the Ministry of Housing, Communities and Local Government published the revised NPPF which states: development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. The Woodland Trust believe this must be given due weight in the plan making process as it shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland and trees. Therefore, whilst the criteria of Policy P4 does seek to protect trees from development and also mitigate the loss of trees, we would recommend that it should acknowledge tree protection and provision more by including the following: ‘There should be no harm to or loss of irreplaceable habitats such as ancient trees and veteran trees’</li> <li>• The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient tree protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information: <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a></li> <li>• We would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for South Bank and Waterloo. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health &amp; wellbeing at a local level. Whilst, at the same time, the Health &amp; Social Care Act 2012 has passed much of the responsibility for health &amp; wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Whilst your Neighbourhood Development Plan does identify the fact that there are shortfalls in community provision, protecting natural features such as community space provision and this is being taken into account with policies for green infrastructure and seek to retain and enhance recreational and local green spaces, resist the loss of open space, whilst also ensuring the provision of some more. Therefore, to what extent there is considered to be enough accessible space in your community also needs to be taken into account with new housing proposals. There are Natural England and Forestry Commission standards which can be used with developers on this: The Woodland Access Standard aspires: <ul style="list-style-type: none"> <li>• That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.</li> <li>• That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.</li> </ul> </li> <li>• The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber &amp; green infrastructure - see the Woodland Trust publication Stemming the flow – the role of trees and woods in flood protection - <a href="https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/">https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/</a>.</li> </ul>
SoWN022	Mayor of London	<ul style="list-style-type: none"> <li>• As you are aware, all Development Plan Documents in London, including neighbourhood plans must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. Paragraphs 184 and 29 of the National Planning Policy Frameworks (NPPF) 2012 and 2018, respectively also require neighbourhood plans to be consistent with the strategic policies contained in any development plan that covers their area. The Development Plan for the Southbank and Waterloo Neighbourhood Area includes the London Plan and the Lambeth Local Plan.</li> <li>• The Mayor published his Draft London Plan for consultation on 1st December 2017 and the Minor Suggested Changes (following consultation) on 13 August 2018. The Examination in Public of the Draft London Plan will commence in January 2019 with publication anticipated in Winter 2019/20. Once published, the new London Plan will form part of the Lambeth Development Plan and contain the most up-to-date policies. The Southbank and Waterloo Neighbourhood Plan (SoWN) is required to be in general conformity with the current London Plan, however any policies that diverge from the Draft New London Plan will become out of date as the Draft New London Plan gains more weight as it moves towards publication. In addition, the Draft New London Plan and its evidence base are now material considerations in planning decisions.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• On 20 January 2017, the Mayor provided comments (reference: LDF22/NP/KR01) on the Neighbourhood Forum’s earlier consultation on the Southbank and Waterloo Neighbourhood Plan, making suggestions as to how the Plan should progress in light of the London Plan. This letter follows on from that earlier advice.</li> <li>• The Mayor welcomes the aspirations of the Neighbourhood Plan in positively promoting green infrastructure, walking and cycling. The Plan sets out clearly the nature of projects it wishes to invest in throughout the neighbourhood area through the use of CIL and planning obligations. However, the neighbourhood plan is largely aspirational and could be more proactive in identifying suitable sites for a range of purposes including those for housing development in order to meet the neighbourhood area indicative housing requirement of 162 dwellings a year, set out in Lambeth’s draft Local Plan.</li> <li>• The Lambeth Draft Local Plan (October 2018) sets out the indicative housing requirements for designated neighbourhood areas. The indicative annual housing requirement that has been set for the Southbank and Waterloo Neighbourhood Area is for 162 dwellings a year and this should form a fundamental element of the Neighbourhood Plan’s housing policy, underpinning the selection of potentially suitable sites to secure housing delivery.</li> <li>• The Southbank and Waterloo Neighbourhood Area overlaps with the Mayor’s identified Waterloo Opportunity Area (OA). As such, the neighbourhood plan should recognise the significance that Waterloo OA will play in contributing the development capacity to accommodate housing, commercial development and infrastructure, in meeting the needs of the local area and the capital as a whole. The strategic approach to the regeneration and/or growth of Waterloo and other OAs is set out in Draft New London Plan Policy SD1 and Waterloo OA is identified in Table 2.1 which sets out indicative guidelines for the delivery of 1,500 new homes and 6,000 new jobs up to 2041.</li> <li>• The Neighbourhood Area sits within London’s Central Activities Zone which is defined in the Draft New London Plan Policy SD4 and its importance and functions are set out in supporting text. The Neighbourhood Plan fails to recognise the significance and the role that the CAZ plays for the local neighbourhood and the whole of London and should adopt the approach set out in the Draft New London Plan. Amendments to the neighbourhood plan should consider the wider context of the area giving more weight to the role and function of Waterloo and Southbank as part of London’s CAZ.</li> <li>• South Bank &amp; Waterloo Neighbourhood Plan Area, image page 14 - The image intends to show the effective boundary of the entire neighbourhood plan area. However, the southwestern boundary of the neighbourhood area is not clear and should be amended so that the full extent of the boundary is visible. Doing so will help to avoid any future boundary issues. The neighbourhood area image should include the boundary of the CAZ, identify the extent of the Waterloo OA and could include some planning designations relating to heritage assets and others.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Page 15, table and supporting text - The table suggests that the neighbourhood area is home to 2,000 residents, while the supporting text states that the area is occupied by 12,000. The correct figure should be used consistently and also the data source used should be cited.</li> <li>• Green infrastructure, open space &amp; air quality - The Mayor welcomes the aspiration of the neighbourhood plan to protect, enhance and provide important green infrastructure in the neighbourhood area which aligns with his ambitions to make more than half of London green by 2050. However, the Southbank and Waterloo Neighbourhood Plan (SoWN) policies should recognise the differences in approach to the protection of open space within and outside areas of deficiency in accordance with Draft New London Plan Policy G4. The neighbourhood plan policies should also take account of the urban greening approach set out in the Draft New London Plan in Policy G5.</li> <li>• Policy P5 part C - While the Mayor supports the intention of the Neighbourhood Forum to improve air quality in and around Waterloo station he considers that the policy should aim to promote the use of electric vehicles and other non-polluting forms of active travel in line with the Mayor’s Healthy Streets approach but should not attempt to ‘restrict diesel taxis and diesel freight vehicles serving the Station’ as these are not material planning considerations. See Policy T2 of the Draft New London Plan.</li> <li>• Policy P9 - The Draft New London Plan has strengthened its approach in seeking the on-site delivery of affordable housing for major developments. This is to ensure the delivery of mixed and inclusive communities. For small housing developments of 25 dwellings or less a more flexible approach to off-site provision can be more acceptable. See Policy H2 of the Draft New London Plan. Furthermore, the SoWN should recognise that the Draft New London Plan’s threshold approach to delivering affordable housing sets out that planning applications following the Viability Tested Route will be required to conduct late stage viability reviews in order to maximise the delivery of affordable housing.</li> <li>• Policy P10 and other guidance - London is the second most visited city in the world. The economic and regeneration benefits that tourism brings to London are great and therefore the Mayor wishes to ensure that given this importance the city is able to meet the accommodation needs of tourists. The SoWN should adopt a more positive approach in policy making for hotel development, recognising that Waterloo is identified as an Opportunity Area within the Central Activities Zone (CAZ) and as such strategically important serviced accommodation should be promoted there in accordance with Draft New London Plan Policy E10.</li> <li>• Policy P12 - The Mayor welcomes the neighbourhood plan’s support for temporary and pop-up uses in retail frontages, however, amendments to the policy should consider that retail in the capital is changing and that some centres may experience a decline in demand for retail floorspace and should therefore be adaptable to accommodate a broader range of uses which can be appropriately accommodated within retail frontages. Policies should encourage a diversity of uses within retail frontages in accordance with Draft New London Plan Policy SD6A.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Social infrastructure and culture. The Mayor welcomes the neighbourhood plans support for arts, culture and leisure activities within the CAZ in accordance with Draft New London Plan Policy SD4 and it should be noted that both Southbank and Lower Marsh/The Cut have nighttime economies of significance at the international/national and regional/sub-regional levels respectively as illustrated in Table A1.1 of the Draft New London Plan.</li> </ul>
SoWN023	Coin Street Community Builders	<ul style="list-style-type: none"> <li>• Coin Street Community Builders (CSCB) is a company limited by guarantee established by local residents in 1984. The company is controlled by a Board, elected by CSCB members. Only people living locally can become CSCB members. The Board employs staff to manage the company on a day to day basis. Profits are not distributed but are ploughed back into CSCB's public service objective. CSCB has transformed a largely derelict 13-acre site into a thriving mixed use neighbourhood by creating new co-operative homes; shops, galleries, restaurants, cafes and bars; a park and riverside walkway; and sports and community facilities - including a neighbourhood centre. It organises festivals, markets and events; provides childcare, family support, youth and community programmes, 1:1 advice, and training and employment opportunities. Income is generated from a variety of sources including leasing property, venue hire, fees for services, and managing businesses – including conferences, a gallery, and joint ventures. CSCB manages and maintains the South Bank riverside walkway between the National Theatre and Sea Containers House as well as Bernie Spain Gardens and other areas of public realm. It is a founder member of South Bank Employers' Group, Jubilee Gardens Trust, South Bank BID, South Bank &amp; Waterloo Neighbours (SoWN), and a number of collaborative local organisations. Current development projects include the consented Doon Street mixed development which includes the completed Rambert headquarters and dance studios, PA1 housing and leisure centre, and PA3 office and town square. Following public consultation and a landscape design competition, CSCB will shortly be submitting plans for the re-landscaping of Bernie Spain Gardens north and Queen's Walk Gardens (between the riverside walkway and the former London Television Centre). Since 2012 CSCB has also been developing proposals for the redevelopment of Prince's Wharf and Gabriel's Wharf.</li> <li>• CSCB has participated in the evolution of the Neighbourhood Plan since the formation of South Bank &amp; Waterloo Neighbours (SoWN) and pays tribute to the dedication and commitment of those who have played a far more active role than we in consulting people living or working in the area about the issues that are important to them. SoWN has then spent a number of years developing policies that, if adopted, would address these. It has been a long and, at times, frustrating experience where inspirational ideas have been watered down in order to meet what we have been advised are the requirements of the statutory process. Delays in taking the draft plan forward to examination have also meant that matters have moved forward and ideas that were once considered too radical – such as banning further hotel development in the area and only permitting 'green' taxis to pick up and set down at Waterloo Station –</li> </ul>

Reference	Respondent	Summary of representation
		<p>have been adopted or are being examined by statutory bodies. This makes the 'Examination version' of the Neighbourhood Plan a very cautious, slightly bland and slightly dated document. CSCB fully supports the Neighbourhood Plan but believes that, an even more important product of the process is the body that has produced it; a body that brings together residents, local businesses, councillors, and other organisations to discuss how they can collectively help shape and improve the neighbourhood. We strongly support the re-designation of SoWN and trust that Lambeth and Southwark will support and empower the organisation going forward. Comments below bring out issues of particular interest to CSCB.</p> <ul style="list-style-type: none"> <li>• Open Space - CSCB is responsible for the management and maintenance of Bernie Spain Gardens and the South Bank riverside walkway between the National Theatre and Sea Containers House. We can testify to the first issue identified: "There is a lack of green open space in the area and development continues both to reduce this and put pressure on existing spaces. After considerable public consultation and an international landscape design competition, CSCB is today submitting a planning application for the re-landscaping of Bernie Spain Gardens (north) and Queen's Walk Gardens (between the riverside walkway and former London Television Centre). We appreciate the reference to Bernie Spain Gardens in the Plan's 'Project List' although, in our particular case, it is capital investment rather than revenue support that is most important. As founder members of Jubilee Gardens Trust, we also recognise that Trust's needs for both capital and revenue support.</li> <li>• Housing - CSCB shares the concern that particular groups of people are unable to access housing in the area. We would wish to see those in need of nursing care included in P7ii. CSCB struggles to recruit Early Years educators to its 84-place day care nursery for children 0-5 years old. A list of groups is given under the summary of policy on page 8 and we believe that further work is needed on who might be prioritised under the general theme of 'housing for those needed by our community'.</li> <li>• Air Quality - This is a particularly serious issue in South Bank &amp; Waterloo and we would like to strengthen Policy P5c so that statutory authorities serve early notice that diesel vehicles will not be permitted to access Waterloo Station rather than waiting for development there which is not foreseen in the period covered by LB Lambeth's revised draft Local Plan. Similarly, we would like to see freight consolidation measures with a restrict to 'green vehicles' the servicing of the area.</li> <li>• Allocation of CIL - CSCB notes the discussion in LB Lambeth's officer report on the Neighbourhood Plan's reference to Policy P20. It is of fundamental concern to CSCB that the enormous amount of development taking place in South Bank &amp; Waterloo has produced only very limited benefits to the community experiencing the disruption and changes involved. Roadworks (such as proposed at the IMAX roundabout) can consume large amounts of money without benefitting the local community. Sometimes there will be great differences in the perspectives of locals, of borough</li> </ul>

Reference	Respondent	Summary of representation
		<p>councils, and of mayoral bodies like TfL. We understood the purpose of the Localism Act which introduced neighbourhood planning to be to give stronger influence to local communities in shaping the future of their neighbourhoods. Watered down policies without influence over the neighbourhood CIL doesn't really hack it.</p>
SoWN024	Canary Wharf Group	<ul style="list-style-type: none"> <li>• As a means of background, in December 2012 Braeburn Estates (comprising Canary Wharf Group (CWG) and Qatari Diar) submitted a planning (LPA application ref. 12/04708/FUL) and associated applications for the major mixed-use redevelopment of the Shell Centre, Waterloo. This application was subsequently approved by the Secretary of State on 5th June 2014. CWG submit these representations on the plan in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended) before it is submitted to an independent examination.</li> <li>• Page 8 – open space policy summary – for consistency with policy P1, it should be made clear that this applies to publicly accessible open space.</li> <li>• Policy P1 – a definition of “publicly accessible open space” should be provided in the supporting text or glossary as it is currently unclear.</li> <li>• Policy P2 – This is considered to be double counting given that Lambeth’s Regulation 123 List (July 2018) already includes “Public Realm: The provision and improvement of the public realm, including streetscapes and parks”, therefore should be removed from the draft Plan.</li> <li>• Policy P3 (a) – this underestimates other requirements at roof level – plant, pvs, etc. These would also make roofs unsuitable for public access; therefore this policy should be reconsidered.</li> <li>• Policy P4(d) – financial compensation for temporary loss of amenity space during construction – this requires a much more detailed evidence base for this policy including how scheme viability has been considered in order for the policy to be considered sound.</li> <li>• Page 44, point 3 – it is not clear what this means, clarification required.</li> <li>• Page 44, point 4 – the landowner/developer should also be part of any discussions.</li> </ul>
SoWN025	LCR	<ul style="list-style-type: none"> <li>• LCR has a number of interests within the Waterloo and South Bank Neighbourhood Plan area, including both the former Waterloo International Terminal, and the Leake Street Arches. Whilst the majority of our comments are made in the context of these two schemes, we have also included some more general comments which we hope are useful. We would therefore be grateful if the comments in this letter could be fully considered by South Bank and Waterloo Neighbours prior to the Plan being submitted for examination.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• For context, LCR is a Department for Transport ('DfT') owned property and regeneration company that has been managing, developing and disposing of property assets for over 20 years. LCR is a regeneration specialist with a Government remit to deliver homes, jobs and economic growth. At Waterloo LCR is working with the DfT, South Western Railway and Network Rail/Wessex Capacity Alliance to bring the former Waterloo International Terminal back into full use for domestic trains as well as ancillary retail provision within the lower levels. Waterloo is the busiest station in UK with just under 100 million passengers passing through the station each year. Between 1994 and 2007, platforms 20-24 served as the London terminus for Eurostar services from Brussels and Paris, but these platforms have since lain vacant following the relocation of Eurostar services to St. Pancras International. The former Waterloo International Terminal is owned by the Secretary of State for Transport who has appointed LCR to manage the asset on its behalf.</li> <li>• LCR's principal interest at Waterloo is the Waterloo Retail scheme ('WR'), which benefits from full Planning Permission (ref 16/02973/FUL), granted 19th May 2017. Planned works include the opening of a new station entrance connecting to the new 'South Square' proposed between WR and Elizabeth House, and the creation of links to the main concourse of Waterloo Station, London Underground, surrounding streets and bus services. Additionally, planning permission<sup>1</sup> has been granted for the change of use of the railway arches beneath the Former Waterloo International Terminal ('Leake Street Arches') to provide: 2,170 sqm of shops, restaurants, cafes and bars (A1/A3/A4 uses); and Public realm improvements including a new pedestrian connection, outdoor seating, lighting, CCTV, cycle parking and other associated works. The Leake Street Arches consent has been fully implemented, and a mixture of independent bars and restaurants is now trading in the completed units.</li> <li>• Policy P3 - Policies P1-P3 establish the Plan's requirements for green infrastructure, open space and air quality. Policy P3 sets specific requirements for the inclusion of green roofs within new developments. At bullet point B, the following requirement is set: "If developers demonstrate that they cannot meet the requirement in P3a [to include an extensive green roof, accessible to the occupants of the building] they should make efforts to identify suitable flat roofs on existing buildings in the neighbourhood area to retrofit an extensive green roof". Whilst LCR is supportive of the overall principles behind the inclusion of green roofs within new development, and the positive contribution such an addition makes, it is not considered that criterion b of the policy can be implemented in practice, unless a situation arises where an applicant controls other land, buildings or development opportunities within the wider area. On this basis, LCR objects to the inclusion of criterion B within Policy P3. Identifying buildings with the potential to accommodate a green roof will give rise to multiple complex issues, including (but not limited to) construction impacts and the disruption brought upon existing tenants, including any financial implications that this impact would generate. It is not uncommon for commercial buildings in particular to have been let by the freeholder to a tenant,</li> </ul>

Reference	Respondent	Summary of representation
		<p>who may have in turn sub-let the building to further tenants. Each stakeholder’s rights would need to be considered if a green roof was to be retrofitted to an existing building. The complexity of undertaking this would undoubtedly add lengthy delays to the development process. It is also not clear how the policy would be applied, if for example commercial negotiations with third parties reach an impasse (see subsequent bullet points). Criterion B of the plan also does not appear to give any consideration to the costs of retrofitting a green roof to a building that was not initially designed to accommodate such a facility. For example, there will be a need to consider whether the roof that is being considered can in fact bear the load brought by the green roof, and whether significant reinforcement works are required. Again, the Plan does not consider the impact of these costs. The Plan does not appear to be supplemented by any supporting assessment of viability, and it is not clear that a full and proper consideration of the impact of this policy criterion has been taken into account. The Policy also does not provide a methodology for identifying the reasonable steps that a developer would be expected to take to identify an alternative green roof opportunity. Notwithstanding LCR’s points above, this is an important omission insofar as for the policy to be effective, applicants will need to understand the activities they are reasonably expected to undertake. Commercially negotiating the ability to undertake works to a third party asset is a significant and lengthy process, and there is every possibility that initial approaches may not be responded to, or that negotiations will simply reach an impasse with neither party reaching a position where an agreement can be made to deliver a green roof on an alternative site. LCR therefore recommends the removal of criterion B from Policy P3.</p> <ul style="list-style-type: none"> <li>• P5 - Policy P5 seeks to deliver air quality improvements around Waterloo Station. Accordingly, the policy states: “Air Quality – Development of Waterloo Station will not be supported unless measures are introduced to restrict diesel taxis and diesel freight vehicles serving the Station” Whilst LCR supports the principle of improving air quality in and around Waterloo Station, it is not considered that the policy as drafted represents an effective way of achieving this outcome, which is better achieved at a London-wide scale. It is important to note that the Mayor of London will be significantly expanding the Ultra Low Emission Zone (‘ULEZ’) across the capital. Whilst this will not apply to black cabs, it will apply to delivery vehicles and will likely have a significant positive impact upon air quality across London generally. Indeed, given the additional costs of running non-ULEZ compliant vehicles within the zone, it is expected that delivery fleets will likely upgrade to cleaner vehicles, in turn bringing benefits to Waterloo and the South Bank. With regard to taxis, the policy as drafted risks the unintended consequence of negatively impacting upon the Black Cab operators, and potentially distorting the market in favour of other providers. It should also be noted that several proposals for schemes across Waterloo and the South Bank will be making use of freight consolidation centres and management plans, thereby reducing the number of individual deliveries that are required. Lastly, the emphasis of the policy is placed on diesel vehicles, however the focus should be on both petrol and diesel emissions. An</li> </ul>

Reference	Respondent	Summary of representation
		<p>alternative would be to align with the requirements of the TfL ULEZ approach which uses Euro Standards (Euro 4 for petrol vehicles and Euro 6 for diesel). LCR would therefore encourage the rewording of the policy as follows: “Air Quality – Development of Waterloo Station <del>will not be supported unless measures are introduced to restrict diesel taxis and diesel freight vehicles serving the Station</del> <u>should demonstrate that opportunities to reduce emissions from non-ULEZ compliant delivery vehicles (Euro 4 for petrol vehicles and Euro 6 for diesel) have been investigated.</u>”</p> <ul style="list-style-type: none"> <li>• P13 - Policy P13 seeks to protect the vibrancy of Lower Marsh and The Cut CAZ. A key component of the policy is the inclusion of a frontage policy to ensure that A1 use class uses are above 50%. Firstly, it is not clear how this should be calculated, for example is the calculation based upon the overall length of the frontage or simply the number of units. Clarification should therefore be included within the policy. Secondly, whilst it is recognised that this requirement broadly echoes that of LB Lambeth’s Local Plan Policy PN1, consideration should nonetheless be given to the current state of the retail market, and the future application of the policy should not be at the expense of alternative non-retail proposals that would otherwise maintain the vibrancy of the area should retail in this area fall into decline. Such examples could include further A3/A4 use class uses, well designed co-working space that provides an active frontage with other complementary ancillary functions (e.g. cafés), or other arts based or creative led uses.</li> <li>• Annex 2 - We would also wish to draw your attention to the fifth paragraph of Appendix 2 which states that some affordable housing will be delivered in line with the Elizabeth House development. It should be noted that the current scheme promoter is not proposing to deliver affordable housing as part of the present scheme, which is intended to be submitted in early 2019. In light of the fact that Leake Street is proving to be a successful and vibrant evening economy location, it may not be preferable to promote the location of residential uses (affordable or otherwise) in this area.</li> </ul>
SoWN026	London Borough of Lambeth	<ul style="list-style-type: none"> <li>• These comments form Lambeth Council’s representation on the Regulation 16 submission version of the draft SoWN neighbourhood plan (NDP). This representation sets out Lambeth’s view on the extent to which the draft NDP meets the basic conditions which are: a) Having regard to national policies and advice contained in guidance issues by the Secretary of State it is appropriate to make the neighbourhood plan. b) The making of the neighbourhood plan contributes to the achievement of sustainable development. c) The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). d) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations. e) Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Lambeth still has concerns with the content of draft NDP policy P20 and whether this can be said to amount to a policy relating to the development and use of land. Lambeth requests that this is something that the examiner considers during the examination of the SoWN draft NDP. The examiner may wish to note the matters considered in the examination of the Isle of Dogs neighbourhood plan in this regard.</li> <li>• Lambeth is of the view that some policies in the draft NDP do not meet basic conditions a) and c). In summary:</li> <li>• Draft NDP policy P1 conflicts with Local Plan policy EN1 and does not provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficient. Local Plan policy EN1 is sufficient to achieve the draft NDP’s objectives.</li> <li>• Draft NDP policy P2 is in general conformity with Local Plan policy EN1, but the NDP policy will cause confusion for the decision-maker and does not provide practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Local Plan policy EN1 is sufficient to achieve the draft NDP’s objectives.</li> <li>• Draft NDP policy P3 undermines strategic policies by not having regard to local character and amenity impacts when requiring green roofs.</li> <li>• Draft NDP policy P4 is not in general conformity with strategic policies and is likely to cause confusion for the decision-maker. The proposed approach to mitigating the impact of construction on open spaces is not evidence based nor has it been viability tested. The NDP policy has not had regard to the relationship between CIL and s106 monies and has not considered how the requirement for compensation will meet the planning obligation tests.</li> <li>• Draft NDP policy P5 (c) conflicts with the strategic policy for Waterloo station.</li> <li>• Draft NDP policy P6 meets the basic conditions but would benefit from being re-worded to make it clearer in its intent.</li> <li>• Draft NDP policy P7 conflicts with the strategic approach to meeting affordable housing need and does not meet the requirements of the NPPF.</li> <li>• Draft NDP policy P8 approach to minimum space standards conflicts with strategic policy and is likely to cause confusion for the decision-maker.</li> <li>• Draft NDP policy P9 meets the basic conditions but it is recommend that it is amended to make clear that affordable housing is only supported off-site in very exceptional circumstances.</li> <li>• Draft NDP policy P10 is in general conformity with strategic policies but criterion 3 of the NDP policy is unlikely to meet the tests for imposing conditions set out in the NPPF.</li> <li>• Draft NDP policy P11 meets the basic conditions.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Draft NDP policy P12 is not supported by adequate evidence to justify the local approach to affordable retail units and has not considered the potential impact on development viability.</li> <li>• Draft NDP policy P13 introduces a local approach that is not supported by adequate evidence. Criterion (b) of the NDP policy conflicts with strategic policies on protecting residential use.</li> <li>• Draft NDP policy P14 should be amended to ensure the policy is in general conformity with strategic policies and does not restrict the supply of offices in the Central Activities Zone.</li> <li>• Draft NDP policy P15 meets the basic conditions. • Draft NDP policy 16 is not in general conformity with strategic policies on social infrastructure and no evidence has been provided to justify a distinct local approach to the facilities identified in the NDP.</li> <li>• Draft NDP policy P17 should be amended so that the NDP policy is clear and unambiguous and can be applied consistently by the decision-maker. Consideration also needs to be given to the relationship with designated CAZ retail frontages and the aim to protect the Lower Marsh/The Cut as a place for independent retailing and local needs.</li> <li>• Draft NDP policy P18 meets the basic conditions but would benefit from being re-worded.</li> <li>• The supporting rationale for draft NDP policy P19 does not have regard to the relationship between CIL and s106 monies and the tests for planning obligations set out in the NPPF.</li> <li>• Draft NDP policy P20 is not in general conformity with the strategic approach to Community Infrastructure Levy and does not have regard to national policy and guidance.</li> <li>• Basic condition b) - Lambeth is of the view that some policies of the draft NDP do not make a positive contribution to sustainable development:</li> <li>• Draft NDP policy P1 does not make a positive contribution to the environmental principle of sustainable development which is concerned with protecting and enhancing the natural environment by potentially allowing for the loss of open space that is not publically accessible.</li> <li>• Draft NDP policy P3 does not make a positive contribution to the environmental principle of sustainable development due to the policy's potential impact on local character, particularly Lambeth's heritage assets.</li> <li>• Draft NDP policy P5 does not make a positive contribution to the environmental principle of sustainable development by potentially allowing the loss of trees in return for their monetary value.</li> <li>• Draft NDP policies P7 and P8 do not make a positive contribution to the social principle of sustainable development by potentially introducing restrictions on the supply of affordable housing required to meet the needs of present and future generations.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• Draft NDP policy P14 does not make a positive contribution to the economic principle of sustainable development if it is seeking to restrict the locations appropriate for office development in the neighbourhood area.</li> <li>• Basic condition d) and e) - Lambeth is of the view that the draft NDP meets basic conditions d) and e). The Strategic Environmental Assessment screening report concluded, following consultation with Natural England, Historic England and Environment Agency, the draft NDP would not have significant environmental effects and therefore does not require a Strategic Environmental Assessment. The draft NDP is not considered to breach the Waste Framework Directive, the Air Quality Directive or the Water Framework Directive. There are no European sites in either Lambeth or Southwark. European sites that are within 10km of Southwark and Lambeth (or at least partially within) are: Wimbledon Common (SAC), Richmond Park (SAC), Lee Valley (SAC) and Epping Forest (SAC) (the main Epping Forest site is more than 15km away from Lambeth). The Habitats Regulations Screening Assessment on the draft NDP has not identified any likely significant effective or impact on the integrity of any European site and concluded that an Appropriate Assessment is not required.</li> </ul>
SoWN027	London Borough of Southwark	<ul style="list-style-type: none"> <li>• The council welcomes the opportunity to formally comment on the examination version of the South Bank and Waterloo Neighbourhood Plan. We recognise the extensive work that has been undertaken to reach this stage in the plan preparation process. However, following our previous consultation to the pre-submission draft we note that some of our comments and concerns have not been addressed. We seek to constructively work with the Neighbourhood Forum and LB Lambeth in the near future to ensure the most appropriate and deliverable plan which reflects the local communities' priorities and ideas is put to an independent planning inspector and can be taken to a successful referendum. A few general comments which apply to the majority of the plan are provided in the context of this.</li> <li>• Firstly, is the concern regarding the apparent lack of a quantitative, detailed or locally specific evidence base for the majority of the policies. It is acknowledged that the evidence base requirements for neighbourhood plans are less stringent than that for Local Plans and Area Action Plans. However it should be reiterated that where proposed neighbourhood plan (NP) policy is either not in general conformity with an adopted Local Plan policy, or a NP policies seeks to go above and beyond an adopted Local Plan policy, the NP policy should be supported by a proportionate evidence base.</li> <li>• Secondly, while it is acknowledged that the Forum has ample support from the local business community and indeed has may established business leaders and members as part of the Forum, that this is a joint resident- and business-led Neighbourhood Plan is not especially obvious in the plan. In the final version of the plan, further consideration should</li> </ul>

Reference	Respondent	Summary of representation
		<p>be given as to how and when businesses can be referenced better and more prominently to ensure inclusivity and illustrate the truly mixed-use nature of the Neighbourhood Area.</p> <ul style="list-style-type: none"> <li>• Thirdly, and as previously highlighted in our response to the submission draft, reference has not been made that any supplementary guidance points included in the plan will not always be able to be employed in planning decisions (due to the limited powers of planning) and that they may simply reflect the wishes and aspirations of the local community as captured by the Neighbourhood Forum. By ensuring this is clear within the plan, expectations can be better managed.</li> <li>• Within Section 3, Paragraphs 4 and 5 we do not agree with the reference to the plan being in conformity with the local plan, which is expanded on below in the relevant sections. We also object to the reference to applying a common approach between cross borough boundaries. The example given is the definition of open space as Lambeth’s definition is used. We object to this, further information is provided in the relevant section below.</li> <li>• P1 - The proposed policy seeks to apply to non-protected open spaces beyond those identified through the LB Southwark’s Borough Open Land (or BOL) and Other Open Space (or OOS) designations (and Metropolitan Open Land, or MOL). Currently there are no such protected open spaces (defined as MOL, BOL or OOS) within the LB Southwark portion of the SoWN Neighbourhood Area. The rationale for NP policy P1 (pg 26) as well as Appendix 1 (pg 80) of the NP explains that the neighbourhood forum have chosen to use LB Lambeth’s definition of “existing open space” (set out in para 9.1 of the Lambeth Local Plan, pg 101) for the purposes of applying the policy within the LB Southwark portion of the Neighbourhood Area. The NP does not seek to designate any further protected open spaces (using the definition within LB Lambeth’s Local Plan) within the SoWN portion of the Neighbourhood Area. Nor are any such spaces within the LB Southwark portion of the Neighbourhood Area identified to which NP policy P1 would potentially apply. Therefore the council does not support this policy and considers that the currently adopted policies within the saved Southwark Plan, Core Strategy and emerging New Southwark Plan (next stage being submission to the Secretary of State) are sufficient to achieve the Neighbourhood Forum’s aims. Furthermore, any further designations would go beyond the council’s key supporting evidence base document, the Southwark Open Space Strategy (2013) which comprises an up to date review of all open spaces within the borough and provides recommendations for protection/designation within any planning policy documents. This evidence base review document and open space strategy has informed the decision to propose any new designated open spaces through the New Southwark Plan, and also informed the decision to not propose any new designated open spaces within the LB Southwark portion of the Neighbourhood Area. Therefore any further designations would seemingly contradict the review and appraisal detailed within our local evidence base.</li> </ul>

Reference	Respondent	Summary of representation
		<ul style="list-style-type: none"> <li>• P2 - Policy P2 is broadly in conformity with the strategic intention of SP11 (Core Strategy) P13 and P58 of the New Southwark Plan, however is more restrictive than local plan policy whereby local plan policy does not restrict new developments which are required to contribute to improvement of existing open spaces or provide additional publically accessible open spaces to those that are a) major and b) contribute to intensification of the neighbourhood. Definition/clarification should be included within the supporting text as to how developments should contribute should this policy remain as currently worded. It is also noted that ‘where feasible’ has been added to the policy, this weakens the application of this policy.</li> <li>• P3 - It is noted that from the pre-submission draft this policy has been amended and now been split into policy P3 and policy P4. P3a) &amp; b) What constitutes a “significant proportion”? The criterion does not take account of different building typologies and site contexts and may therefore end up difficult to implement / use in planning decisions. P3a) &amp; b) rationale: Last bullet point of the rationale for P3a reads like a policy requirement and could therefore be inserted with criterion a) to better help achieve the policy aim. For P3b, the rationale mentions a study looking at what existing roofs could be subject to greening. It would be useful to include an overview map of the roofs which the study identified in the plan to indicate what roofs the policy could help green. P3c) this point is very specific, again the criterion does not take account of different building typologies and site contexts and may therefore end up difficult to implement /use in planning decisions.</li> <li>• P4 - P4a) Most developments in this area would be mixed use and non-residential uses are not required to provide amenity space for occupiers. Encouraging this to be provided through the neighbourhood plan policy could be supported where strongly justified, however imposing strict requirements (as per current wording) is going beyond local plan policy without sufficient reasons and demonstrating that this would be deliverable. Amenity space standards are already set out in adopted local policy and guidance for residential development. Requiring this for commercial development may not always be feasible and the policy should acknowledge this. P4a) Rationale: The rationale only refers to residential developments, for which policy requirements and guidance already exist and are used in decision making. There is no reference to non-residential, which this policy requirement may not be appropriate for in all cases (see previous comment). P4b) Point sets design criteria, which raises no conformity concerns, although does not add anything additional to existing policy. P4c) Requiring major proposals (through the use of the word “must”) to only “have regard” to the guidance raises questions about the necessity of this policy criterion, as decisions are less likely to be determined on whether this policy requirement has been met or not due to weak wording. P4d) This criterion raises conformity concerns with the proposed tariff due to it not being sufficiently focused on achieving demonstrable air quality and acoustic design benefits proportionate to the impacts of construction. Evidence may also be needed to show that the proposed tariff would not threaten viability and</li> </ul>

Reference	Respondent	Summary of representation
		<p>consideration should be given to the tests for planning obligations. We echo LB Lambeth’s comments (e.g. define “major temporary loss of amenity” beyond “likely to be limited to dust and noise impacts,” as stated in the rationale). What do the neighbourhood forum refer to when specifying “publically accessible open space”? Is this LB Lambeth’s definition? If so this cannot be applied to the Southwark portion (see comment on P1). The policy wording should amended to be specific to the contexts of each borough, i.e. for the LB Southwark portion of the Neighbourhood Area the policy should read “protected open space” or “designated open space” “(such as MOL, BOL or OOS)”. P4d)</p> <p>Rationale: With the simple formula already established (as detailed in the rationale section), it would be useful to demonstrate how effective/useful this policy requirement would be by using illustrative examples of sites recently or currently under construction which have had a significant enough impact on publically accessible open space, and establish the amount of funding that the development would have raised to be put toward any offsetting/mitigation projects. Any temporary major loss (however defined) would have to be estimated during the application process (presumably through a construction management plan) in order for this to work as a development management policy, as the “temporary major loss of amenity” will actually occur after planning permission has been granted and the scheme is in build-out phase. Any proposed along the lines of P4d should be re-worded to reflect this. P4e)</p> <p>Southwark does not currently have an adopted trees policy so a neighbourhood plan policy on trees is welcome subject to the specifics. However the NP policy should consider following the New Southwark Plan Proposed Submission version policy P60 (“Trees”) by requiring that development proposals seek to retain and enhance existing trees on sites as a priority. This option is not included in the NP policy but rather accepts the loss of trees from the off, at which point the policy requirement is triggered. The conformity of this criterion would be improved by ensuring a presumption in favour of replacing trees rather than funding alternative green infrastructure.</p> <ul style="list-style-type: none"> <li>• P5 - As set out above, the New Southwark Plan sets out measures to improve air quality in the borough. It is not considered necessary for this policy to be repeated in the neighbourhood plan. “Key issues” and “Consultation and Evidence Base” sections The evidence provided for this policy is focused on Love Lambeth Air project. Evidence should also be provided for Southwark to justify the application of this policy in this area.</li> <li>• P6 - The principle of supporting temporary uses is in broad conformity with the strategic objective of efficient land use. Efficient temporary use of the site could include other land uses beyond ‘community and commercial activity’ such as cultural or town centre uses. Note the policy wording “is encouraged” means that this requirement is not particularly strong (which is considered appropriate) and so expectations could be managed by making reference to this in the supporting text. “Key issues” and “Consultation and Evidence Base” sections of policies P1-P6 A “key issue” identified (page 24) is the erosion of open space (page 24). This is also referred to in Appendix 1 “Summary of results of consultation and evidence for P1 – P6” (page 80) which makes further claim that “the net amount of publically</li> </ul>

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		<p>accessible open space in the area has been reduced through development and though Lambeth and Southwark policy resists its loss, this has not always been effectively enforced via the planning system.” LB Southwark takes issue with these statements as they have not been substantiated with any supporting evidence demonstrating that this is the case, such as quantities of open space lost and the sites where this has happened. Are there any figures/evidence/examples to support this? If no evidence can be presented demonstrating this loss we request it be removed from the plan/have the plan acknowledge it does not apply to the LB Southwark portion of the Neighbourhood Area. Please also bear in mind that “open space” which is protected by policy within LB Southwark refers to formally designated/protected open space only, such as MOL, BOL and OOS. Reference to the loss of other types of open space within the LB Southwark portion of the Neighbourhood Area could be made providing the statement is supported by examples/evidence, however we would also request that the plan acknowledges that LB Southwark policy does not try to protect these spaces, therefore it is not correct to frame it in terms of a policy failure. Regarding the application of Lambeth’s definition of open space within the LB Southwark portion of the Neighbourhood Area (penultimate para on pg 80): The purpose of transplanting this definition is not clear as the Neighbourhood Plan does not identify any additional sites it would like recognised as “open space” (as per the LB Lambeth definition) within the LB Southwark portion of the Neighbourhood Area (subject to clarification the location of King’s Plaza, which could not be identified from a desk-based search). Should the Neighbourhood Forum decide to designate any of these sites the council would not support these as it would be in conflict with our adopted and emerging policies on Protected Open Space/Designated Open Space (interchangeable terms) (please refer to comment on P1).</p> <ul style="list-style-type: none"> <li>• P7 - The policy P7 presupposes that the Neighbourhood Area constitutes a housing market area with unique housing needs to that of the wider housing market area. There is no evidential basis referenced within NP policy P7 upon which to justify variance with the strategic approach taken in Local Plan documents. Existing and emerging Local Plan policies support proposals for a range of affordable housing and housing providing care services for elderly residents. The proposed NP policy seeks to prioritise the housing needs of residents and workers within the neighbourhood planning area. Any prioritisation of people living or working within the SoWN planning area impedes Southwark’s opportunity to meet its objectively assessed housing need; not least because part of the neighbourhood planning area (the part that is in Lambeth) falls outside the housing market area upon which Southwark’s Local Plan policies are based. The NPPG states that any housing need from a neighbouring authority that is to be accommodated (agreed through a statement of common ground) should be added to the need already calculated for that authority to form a new minimum housing need figure (Paragraph: 014 Reference ID: 2a-014-20180913). Neighbourhood Forums can identify specific local needs relevant to their neighbourhood but these must be supported by</li> </ul>

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		<p>proportionate evidence (Paragraph: 040 Reference ID: 41-040- 20160211). The neighbourhood plan should support the strategic development needs set out in Local Plans, including policies on housing and economic development. The level of housing and economic development is a strategic policy issue (Paragraph: 070 Reference ID: 41-070-20140306). The proposed policy does not appear to be supported by evidence. The Southwark Plan, Core Strategy require the provision of affordable housing on all development providing 11 or more homes and emerging New Southwark Plan requires it all residential development. The requirement is based on the objectively assessed housing needs of the borough and tempered by a consideration of viability. Local Plan affordable housing requirements include a proportion of social rented homes (which meet the need of lower income households) and intermediate tenure homes (which meet the need of middleincome households). Social rented housing allocation is outside of the planning process. However, priority is currently awarded to households fulfilling a number of criteria. Any restriction on access to social rented housing for people working within the neighbourhood planning area is unworkable because the Local Housing Authority would not accept such restrictions. Intermediate housing is available to households with an income below a level set by the LPA. As such, restriction of access to intermediate housing to people working within the neighbourhood planning area is incompatible with the Development Plan. In practical terms a housing provider would be unwilling to purchase intermediate housing with additional restrictions. It is noted that Policy P5 (now Policy P7) Point 2 of the draft version of the Neighbourhood Plan has been removed relating to affordable housing for older people wishing to downsize to one bedroom flats. This removal is accepted as these must be provided in accordance with the strategic area-based housing mix requirements set out in the Local Plan. LB Southwark supports the provision of housing which provides specialist care to elder residents. Were these to be made available at an 'affordable' level this would not obviate the requirement to provide a policy compliant contribution of conventional affordable housing. The Council may consider flexibility in affordable housing policy when taking into account the terms under which any specialist affordable housing accommodation offer is made. Whilst the proposed policy does not seek to privilege access to affordable elderly care accommodation to residents within the neighbourhood planning area, it should be noted the Local Plan policies are designed to meet strategic affordable housing needs, i.e. housing needs defined at the borough level. As such no favourable consideration could be given to development proposals that seek to privilege access to residents of the Neighbourhood Area. It is recommended the proposed policy is withdrawn because it seeks to support development which would be supported under the policies in the development plan and is therefore repetitious. The policy also seeks to introduce restrictions on access to certain types of affordable homes which undermines the Local Plan policies designed to meet the borough's strategic housing needs. The Council supports the provision of the affordable housing types identified in policy P7 in order to ensure sustainable development. Restrictions on access to any new housing supply to people</p>

Reference	Respondent	Summary of representation
		<p>residing in or working in the neighbourhood planning area undermines this objective. The LPA has a duty to consider the equalities implications of proposed planning policies. Prioritisation of affordable housing based on a connection to a Neighbourhood Area would have an unjustifiable impact on access to affordable housing services for residents in need of affordable housing elsewhere in the borough, especially given that those needs may be more acute. Affordable housing policies are set at the borough level because affordable housing allocation is administered at the borough level by the Local Housing Authority. Furthermore, development opportunities are not equally abundant across the borough and it would be inequitable to prioritise the housing needs of the borough’s residents based on whether they live or work in the vicinity of development opportunities.</p> <ul style="list-style-type: none"> <li> <p>P8 - It is unclear why P7 and P8 are separate policies. The general comments above stand in relation to P7. Additionally, the proposed policy repeats London Plan policy by stating that proposals which meet the minimum space standards set out in the London Plan will be supported. Co-housing is a form of housing which may be supported anywhere within the borough under the existing and emerging Local Plan. It is therefore unnecessary to restate this policy position in relation to the part of the Neighbourhood Area within Southwark. Comment on Rationale for P8 The statement in the opening sentence of the rationale text for policy P8 does not reflect Southwark’s development plan. Therefore the text could potentially be considered misleading. The statement should be removed/amended to accurately reflect and/or acknowledge Southwark’s affordable housing policy. National policy refers to social housing as including both “social rent” (the most commonly referred to definition of which is referenced below below) and “affordable rent.” The former is set at what are normally termed “target rents.” Target rents are traditionally associated with “social housing” (and indeed council housing) as it is normally thought and, through the application of the “national rent regime” formula, typically end up with rent levels at around 30% - 40% of the market rate. The product known as “affordable rent” was introduced by the Government in 2011. The Government considers “affordable rent” as a form of social housing. Rent levels for “affordable rent” are worked out using a different formula than traditional social/target/council rents and can be up to 80% of the market rate. The council’s approach to “affordable rent” was clarified in a report to Planning Committee which states the council will always seek to prioritise “social rent” housing over “affordable rent” housing. Where “affordable rent” housing is justified on grounds of development viability in any development proposals within the borough then the council will seek to ensure that any “affordable rent” units comprise of 1 and 2 bed units only. This leaves the opportunity for the larger rented, affordable homes to be supplied as familysized (3 bed+) “social rent” homes at target rents (which best helps meet our objectively assessed housing need). Furthermore, the council will always seek to ensure that any “affordable rent” homes permitted (on the grounds of viability) will have their rent levels set at no more than the Local Housing Allowance (LHA) levels (housing benefit cap levels), again to ensure the product best meets</p> </li> </ul>

Reference	Respondent	Summary of representation
		<p>Southwark’s housing needs. With a few exceptions, “affordable rent” units permitted in Southwark have generally been permitted on these terms only.</p> <ul style="list-style-type: none"> <li>• P9 - In principle there is no objection to requiring developers to consider options to deliver off-site affordable housing within the neighbourhood planning area provided this is restricted to the borough in which the main development takes place. It would be unacceptable to deliver offsite affordable housing in LB Lambeth associated with a development in LB Southwark. “Consideration” is non-binding and the Council would not accept a position where off-site affordable housing provision within the neighbourhood planning area resulted in a lower contribution to that which could be delivered elsewhere. Local Plan policy sets out the tenure mix requirements for affordable housing which requires a proportion of social rented homes and a proportion of intermediate tenure homes. The proposed policy is unclear what type of affordable housing would be brought forward under the model proposed in the policy. It can be assumed that the intention is to bring forward this type of affordable housing as a form of intermediate housing. It is acceptable to require developers to consider options to deliver their intermediate housing requirements under the proposed model. “Key issues” and “Consultation and Evidence Base” (Appendix 2) comment The council request that the statement within the key issues which reads “Affordable housing delivered through development is unlikely to be affordable for most.” be supported by evidence or if not possible removed from the plan. Can you show a selection of affordable housing units that have been approved and constructed in the neighbourhood area, their tenure and what their likely rent/mortgage costs &amp; rent (for shared ownership) is depending on their tenure? The specific arrangements of each unit/set of units within schemes would be detailed in S106 agreements for any affordable homes, including social rented, “affordable rent” and intermediate units. These rent levels could then be compared against a range of lower income occupations within the area and assessed to see if the housing costs equate to a third of income (which is generally considered the point at which housing costs can be called affordable, any more than this and it is considered unaffordable – although different sources specify whether to use gross or net income). Please note the earlier comment about distinguishing between traditional social housing let at “target rents” and “affordable rent,” which when permitted within Southwark is required to be one and two bed units and let at no more than the maximum LHA levels to ensure affordability. The council request that the statement “Too much residential is not permanently lived in” is supported by evidence or, if not possible removed from the plan. This issue has been the focus of much media attention over the past year or so and has been associated with the impact of foreign buyers. However there has been little evidence to support such claims regarding the pervasiveness of “buy-to-leave” or indeed non-primary residences. To fill this gap in the current evidence base the Mayor commissioned a study to assess the impact of foreign investment and buyers in the London housing market, including the extent and effect of what’s come to be termed “buy-to-leave.” The report ‘Overseas Investors in London’s New Build Housing</li> </ul>

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		<p>Market’ was published in June 2017. It is acknowledged that Southwark is ranked 6th out of the top 10 Boroughs to make a proportion of overseas sales. However further in this document it has also been acknowledged that Southwark is not ranked in the top 10 Boroughs with new build properties in locations with the greatest proportions of no usual residents. From this study’s conclusion the proportion of homes left empty or under-used is greater than the properties of higher values, in London bought by overseas investors. Due to the evidence produced by this study which fails to support the initial statement that “Too much residential is not permanently lived in” we request for this to be removed from the plan. For the second para on pg 83, please see the comment regarding the request that the plan reflect/make reference to LB Southwark’s local approach to “affordable rent,” mentioned in the “key issues” comment above (i.e. the product that can be up to 80% up to the market rate). For the fourth para on pg 83 what evidence is this referring to? Penultimate para, pg 83 - “Policy approaches below” presumably should read to reflect reorganised plan (i.e. “policy approaches in section 8.2”).</p> <ul style="list-style-type: none"> <li>• P10 - It is noted that the previous reference to no net loss of office and residential accommodation has been removed which is supported as this is covered in the local plan. Requiring hotels to deliver benefits such as local employment and retail frontages and other beneficial uses to the community are agreeable in principle. The New Southwark Plan Proposed Submission version: Amended Policies Policy P36 requires similar benefits – 10% of ancillary facilities in hotel developments to incorporate a range of daytime uses and offer employment opportunities. The Forum is advised to consider this policy’s wording to ensure clarity. In point 1, reference to ‘retail’ frontage should be amended to ‘active’ frontage as ‘retail’ frontage is too limited, this will also ensure consistency with Amended Policy P36. The wording of Point 3 is unclear and should either be reworded or removed. The wording ‘where possible’ also undermines the application of this policy point and therefore it is considered to be unnecessary. The application of Point 4 should be clarified, its current wording is not clear in terms of how the local recruitment mechanism would function to employ locally. The wording ‘where possible’ also undermines the application of this policy point and therefore it is considered to be unnecessary.</li> <li>• Guidance points - While the council supports any developers engaging with both the council and the local community prior to the submission of a planning application, the council cannot require that this be undertaken. Therefore the guidance point relating to a development review panel will not be possible to implement and the plan should seek to manage expectations by referencing this fact. The subsequent two guidance points, namely that “the suggestion that ‘the post consent, the panel should be notified of and invited to comment on the discharge of 2 years where a review shows that negative impacts have arisen from the development’ is not in line with statutory consultation requirements for planning applications. In addition, this wording is not clear. We support the removal of the “impact review clause” as this would not be consistent with the statutory tests for use of planning obligations in the</li> </ul>

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		<p>Community Infrastructure Levy Regulations 2010 (also set out as policy tests in the National Planning Policy Framework); or with national guidance.</p> <ul style="list-style-type: none"> <li>• “Key issues” and “consultation and evidence” for Section 8.3 Can the statements in the “key issues” be supported with examples to illustrate, for example, where “public realm improvements are not always appropriate to the development context?” or in what ways “the relationship between the impact of development on heritage sites north of the river and the impact on the local setting is not clearly understood”? These statements are not supported with examples in the related “consultation and evidence base” section, therefore question whether they should be in the plan as identified key issues. It is acknowledged that this is one of the few policies supported by quantitative evidence. Using an existing (or new) evidence base to support a distinctive approach at the neighbourhood area level is supported and encouraged and should similarly be used for the other policies, which currently are suffering from a lack of supporting quantitative evidence , making it hard to agree with the reasons behind the policies.</li> <li>• P11 - This policy is very specific and is not considered necessary for a neighbourhood plan. The NPPF Paragraph 55 sets out that conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects (our underlining). As such, the policy is not in conformity with the NPPF as it is not necessary, enforceable or reasonable to expect new developments to be treated with permanent anti-graffiti coating.</li> <li>• P12 - The NP policy encourages a range of unit sizes consistent with town centre policy aims. However it is not clear if the RIBA Category B standard should be applied to all retail development or whether this is aimed at smaller unit sizes. Cat. B may not be suitable for all new retail development. The policy could encourage smaller unit sizes which would benefit from full fit out. The RIBA Category B is not explained within the plan accompanying text (is it consistent with the other bullet points outlined with regard to fit-out in supporting text?) so this should be provided to enable an easy reference guide for developers, or have the list in the supporting text for P12 referenced as containing criteria which meet RIBA Category B standards, if it does. Supporting a range of unit sizes is consistent with London Plan policy 4.8. The context with regard to CAZ, Opportunity Areas, Strategic Cultural Areas and town centre policies in the London Plan should also be considered. The Neighbourhood Forum should also consider the information found within LB Southwark’s Employment Land Review (2016) and our most recent Retail Study (2015), both available on the council’s website.</li> <li>• P13 - The figure of 50% in policy P13 should be amended to 40% to be consistent with the emerging New Southwark Plan. The policy should be supported by evidence (e.g. a survey of uses within the protected shopping frontage) to demonstrate a 40% level of A1 and 30% of A3 uses can be maintained. The background text should explain why the policy makes exception for the two buildings referred to for clarity purposes. Rationale The wording in the first</li> </ul>

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		<p>sentence could be amended to better reflect policy designations regarding the Southwark portion of The Cut, i.e. amend wording to refer to Southwark portion of Cut frontage as a “protected shopping frontage” (which is the formal policy designation) rather than “shopping parade.”</p> <ul style="list-style-type: none"> <li>• P14 - The first part of the NP policy is consistent with saved Southwark Plan policy 1.5 (small business units) Core Strategy Strategic Policy 10 and emerging Policy P26. It would be helpful if this policy was supported by further local evidence base (particular demand for offices under 1,000 sqm) (please see Southwark Employment Land Review 2016) and in particular reference to a sustained demand for high quality new office space in the CAZ and growing trend towards flexible workspaces and co-working space. The first part of the NP policy is broadly consistent with London Plan policies 4.1 and 4.2 – also see London evidence base e.g. London Office Policy Review, London labour market projections, CAZ SPG (guidance). We note the reference in the policy regarding the loss of office space of more than 1,000sqm has been removed, this is supported. Rationale: Is the opening statement of this section supported by evidence? If so can it be included in the plan?</li> <li>• P15 - This policy relates solely to land within LB Lambeth, therefore LB Southwark does not have comments regarding this policy.</li> <li>• Guidance point 1 - In principle the council supports the provision of business space that is affordable for startups and SMEs. S106 financial obligations must be used to make the development acceptable in planning terms. Separate from S106 monies, S106 agreements can be used to secure provision of space for established employers/businesses displaced by a development. This is also the intention for the emerging New Southwark Plan Amended Policy P28 (Small and independent businesses) which the Neighbourhood Forum is welcome to support through the Neighbourhood Plan guidance. Affordable workspace can be encouraged through design specification and working with specialist workspace providers. Subsidising businesses through CIL is not possible. Any CIL spend within the Southwark portion of the Neighbourhood Area must be for physical infrastructure that supports growth as per our S106 &amp; CIL SPD.</li> <li>• Consultation and evidence base Reference 15 on page 83 requires revisiting, presumably Para 6.38 of Lambeth’s employment study should not be referred to and the “unhelpful as the NP area is an..” text prior to the weblink for the PDF of the report was not intended to be included within the reference.</li> <li>• P16 - The four sites proposed for protection are located outside of LB Southwark so no further comment is provided</li> <li>• Guidance point 1 It is advised to manage expectations on the guidance point via more considered wording on the prioritisation and spend of CIL money. Expressing the wishes of the community via these guidance points is acceptable in principle but to use language such as “should only be allocated” implies a hard policy requirement. As</li> </ul>

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		<p>the Neighbourhood Forum will be aware LB Southwark already has an established process for the prioritisation and spend of CIL money (see comment on P19 for further comment).</p> <ul style="list-style-type: none"> <li>• Guidance point 2 (regarding requiring some NCIL monies to be allocated for revenue spend) conflicts with the Southwark approach to CIL in the S106 and CIL SPD (which limits spend to capital projects on physical infrastructure which support growth). Spend on projects is determined by the community councils in consultation with the local community, including the Neighbourhood Forum and informed by the projects included in the Neighbourhood Plan.</li> <li>• Guidance point 9 Again to manage expectations, the NP will not be able to impose a new tax on pop-up shops, shows, installations etc. so the wording of this point should be considered to reflect this.</li> <li>• P17 - No comment as the Leake Street is located outside of Southwark.</li> <li>• P18 - It would be worth considering the policy's wording to include reference to replacing existing Legible London signage as well as implementing new signage through development.</li> <li>• "Key issues" and "consultation and evidence base" section The statement that "streets are not adequately maintained" (third bullet point pg 60) is rejected by the highways and public realm teams within LB Southwark. For all spaces and routes the council is responsible for we always seek to ensure our public realm and highways are maintained to the highest standards. Please do remember to distinguish between Local Authority-managed Adopted Highway and the Transport for London Road Network (TLRN), which the local authority is not responsible for.</li> <li>• P19 - Any highways-based public realm and highways works delivered in Southwark is required to meet the design standards within the Southwark Streetscape Design Manual (SSDM) : "Where design proposals for the Highway (including new streets and spaces) are associated with schemes seeking or approved Town and Country Planning Permission then it is important to note that these require separate Approval by the Highway Authority in accordance with SSDM requirements before works may take place on the Highway. In order to avoid the possibility of abortive work due to conflicting consents it is strongly recommended that private bodies or individuals wishing to carrying out works to the Highway engage with the Highway Authority before or in parallel to obtaining other consents. SSDM adoptable standards apply to all Highways - whether they are existing or proposed, private or publicly adopted and maintained. A form of Departure Approval is always required to vary from the requirements of Design Standards." Any departure from this standard will be worked through on a case-by-case basis including through S106 agreements and the relevant Highways Approval Authority. Therefore the council does not support this policy.</li> <li>• P20 - It is noted that the wording of this policy has been amended and now states 'where feasible'. This amendment is welcomed, if the policy is to remain. LB Southwark has an established process and procedure for identifying, prioritising and funding projects which are proposed to be the beneficiary of the neighbourhood element of CIL. This is set out in our S106 and CIL SPD (2015). Getting a project onto a community infrastructure project list (or CIPL)</li> </ul>

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		<p>requires approval from the relevant community council (in this case the Bankside, Borough and Walworth community council), comprised of the ward councillors of the three relevant wards. Therefore, the NP policy is highly restrictive and does not reflect the council's established processes for NCIL projects. The forum would be welcome to continue to suggest projects to the community council after the adoption (and lifetime) of the plan, either as individuals or part of another community group. However it is not appropriate to accept that individuals/group's suggestions will take precedent over others due to involvement with the neighbourhood forum and associations with the preparation of the neighbourhood plan, as per the NP policy. As the forum has drafted a list of projects means that the council will look forward to liaising with the local community and SoWN to agree project list priorities and consider the projects included in the NP on the council's CIPL.</p> <ul style="list-style-type: none"> <li>• Rationale for Policy P20 Regarding the statement which reads: "This arrangement follows the example of the successful London Eye revenue S106 agreement which is defrayed by local people according to local need." This statement does not reflect Southwark's adopted local approach to NCIL, that being that any NCIL spend must be on capital projects which are physical infrastructure that support growth and that the prioritisation of the projects is determined by the community council in consultation with all interested parties within the local community, not just the neighbourhood forum/any successor body.</li> <li>• Guidance in Section 8.7 Obligations within S106 agreements, where agreed/in draft form, are reported within officer report on the application. As part of the statutory consultation process on any application which will require a S106 agreement, any interested persons or parties can submit a representation suggesting ideas for S106 monies spend related to that application.</li> </ul>