

Title:

South Bank and Waterloo Neighbours Draft Neighbourhood Plan – Decision following receipt of the Examiner’s report

What is changing?

A draft Neighbourhood Plan has been produced by the South Bank and Waterloo Neighbours (SoWN) Neighbourhood Forum. The neighbourhood area is cross-border with the London Borough of Southwark,

The draft Neighbourhood Plan has undergone examination by an appointed independent examiner to test whether or not the draft plan meets the basic conditions and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The draft plan contains community aspirations and planning policies under the following headings: green infrastructure, open space and air quality; housing; development management; retail and work; social infrastructure and culture; streetscape and transport; and planning gain and mitigation. If 'made' (adopted) following examination and referendum, the plan will be used in determining planning applications in the designated South Bank and Waterloo Neighbourhood Area and will form part of both councils' development plan.

Following the independent examination, a report was issued to the local planning authorities and neighbourhood forum. The examiner's report recommends that the draft Neighbourhood Plan should proceed to referendum, subject to modifications (as detailed in Table 1). If the draft Neighbourhood Plan is successful at referendum and made, it will form part of the Development Plan for both Lambeth and Southwark and be used in decision-making by the Local Authorities for proposals within the Neighbourhood Area.

The local planning authorities must now make a decision based on the examiner's recommendations as to whether the draft Neighbourhood Plan meets the basic conditions, the statutory requirements and whether it complies with the convention rights as set out in the Human Rights Act 1998.

Lambeth have reviewed the examiner's report and considered the modifications recommended and agrees that subject to the modifications recommended by the examiner, the draft Neighbourhood Plan should be submitted to referenda, contained within the neighbourhood area.

Who will be involved?

The decision will be made by Cabinet - Member Councillor Matthew Bennett, Cabinet Member Planning, Investment and New Homes.

What do we know about the people who will be impacted by this change?

The draft South Bank and Waterloo Neighbourhood Plan contains demographic data about the neighbourhood area (Appendix 7 – Area data).

- The neighbourhood area has a resident population of 9,656.
- The resident population is 47.9% female and 52.1% male.
- The mean age of the neighbourhood area population is 35 years – 25.1% of the population is age 30 to 44.
- 59% of the neighbourhood area's population is 'White'. The second largest ethnic group is 'Asian/ Asian British' at 18% of the neighbourhood area's population. 14% of the population are 'Black/ African/ Caribbean/ Black British'.
- The area has 4,554 households. The largest number of households live in 'Housesholds rented from private landlord or letting agency' (30%) and the second largest live in 'Households rented from other social landlords' (24%).
- In terms of employment, 20.35% of residents aged 16-74 are in 'Lower managerial, administrative and professional' roles. The second largest group are 'Not classified' which includes full time students and economically inactive people, followed by 'Higher managerial, administrative and professional' roles.
- 43% of the neighbourhood area's residents have Level 4 qualifications and above compared to 27% in England as a whole. 13% of residents have no qualifications compared to 22% in England as whole.
- The majority of residents identify as being in 'very good health' or 'good health'.

In addition, a best-fit review of the Lambeth portion of data available from the Office of National Statistics show:

- The neighbourhood area has a usual resident population of approximately 8,000.
- The mean age of the neighbourhood area population is 35.4 years - 25% of the population is age 30 to 44.
- The area has approximately 3,840 households. The largest number of households live in 'Households rented from other social landlords' (38%), followed closely by 'Housesholds rented from private landlord or letting agency' (37%).
- In terms of employment, approximately 24% of residents aged 16-74 are in 'Lower managerial, administrative and professional' roles. The second largest group are 'Not classified' which includes full time students and economically inactive people, followed by 'Higher managerial, administrative and professional' roles.
- 49% of the neighbourhood area's residents have Level 4 qualifications and above, while 13% of residents have no qualifications.
- The majority of residents identify as being in 'very good health' or 'good health'.

Key stakeholders that have been involved in the preparation of the draft Neighbourhood Plan, and those that are likely to be affected by the draft Neighbourhood plan, if made, are:

- Those who live, work and carry out business in the South Bank and Waterloo Neighbourhood Area
- SoWN Neighbours Forum
- Tenants and leaseholders
- Residents' associations
- Community and voluntary groups

- Elected politicians
- Business Improvement Districts and business networks
- Developers and landowners (and their representatives)
- Registered providers of affordable housing
- Infrastructure providers (such as transport and health services)
- Statutory consultees such as the Mayor of London, London Borough of Lambeth, London Borough of Southwark, Historic England, Environment Agency and Natural England.

A total of 27 representations were received during the Regulation 16 consultation on the draft Neighbourhood Plan between 8 November and 20 December 2018. These representations were sent to the examiner alongside the draft neighbourhood plan for his consideration.

How will they be impacted by the change?

Table 1 assesses the impact of the policies in the draft Neighbourhood Plan, as proposed to be modified, against the protected characteristics of age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic impacts and impacts resulting from English as a second language.

The draft South Bank and Waterloo Neighbourhood Plan is based on 7 key themes; Green infrastructure, open space and air quality, Housing, Development management, Retail and work, Social infrastructure and culture, Streetscape and transport and Planning gain and mitigation. The policies, with proposed modifications, under these key themes are detailed in Table 1 below.

Table 1: Assessment of the Examiner’s proposed modifications to the draft Neighbourhood Plan policies and the equalities impact

Neighbourhood Plan policy <i>(as proposed to be modified)</i>	EIA analysis of Examiner’s Report and proposed modifications
<u>Green infrastructure, open space & air quality</u>	
<p><i>P1: Applications which propose any permanent reduction of existing <u>publicly accessible open space (other than open space that is ancillary to, and/or within the curtilage of a building)</u> will not be supported unless:</i></p>	<p>P1 seeks to protect existing publicly accessible open spaces and ensure the quality of new, replacement open space is of equal or greater value whilst supporting the additional needs arising from development, and the Examiner recommends modifications to the policy.</p>

<p>a. New publicly accessible open space of equivalent quantity is created within the Neighbourhood Plan area which replaces open space lost as a result of that development.</p> <p>b. The quality, <u>and amenity value</u> and public access of proposed open space both is as good as the lost open space, and also meets the additional needs arising from the development, <u>and where the space lost was publicly accessible, equivalent public access be provided to the proposed open space.</u></p> <p>c. In appropriate cases more or better quality open space may be required to compensate for other harm.</p>	<p>It is considered that the draft policy as proposed to be modified will not result in any negative impacts on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area as the modified policy may provide the health and well-being benefits attributed to open spaces. Furthermore the proposed modifications remove reference to 'publicly accessible', meaning that the policy in its subsequent amendment form applies to all open spaces (other than open space that is ancillary to and/or within the curtilage of a building) in the neighbourhood area. Protection of existing open space can encourage healthy lifestyles and mental well-being for those equalities groups at greater risk of ill-health (e.g. some children and young people, some older people, some women, some members of ethnic minority communities, people with a history of mental illness). Evidence suggests certain population groups are more likely to benefit, for example:</p> <ul style="list-style-type: none"> • Children: A greater quantity or proximity of natural spaces around the home or school is significantly related to improved cognitive performance and reduced incidence of behavioural issues. Evidence suggests that use of green space by children is a lifetime determinant of future use. • People with health and well-being concerns: Evidence shows that among other benefits, viewing nature is positive for health in terms of recovering from stress, improving concentration and productivity, and improving psychological state. Living environments with a greater amount of green spaces are associated with reduced likelihood of depression and anxiety amongst those from this group. <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, socio-economic groups and those with English as a second language is considered to be neutral.</p>
<p><u>P2: Major developments (of any land use) which contribute to the intensification of the neighbourhood area are likely to intensify, to a material degree, pressures on existing publicly accessible open space</u></p>	<p>P2 seeks to improve existing open space or provide additional publicly accessible open spaces where major developments contribute to the</p>

<p><i>should contribute – in a manner and to an extent related to the development – to the improvement of existing such open spaces or provide additional publicly accessible open space where feasible.</i></p> <p>Rationale for policies</p> <p>Policy P2 & P3 – Due to the unique pressure on public open space in this central London environment, there should be an extra requirement on developers to ensure that buildings accommodate both occupants of buildings and the public without exacerbating existing pressure. These policies apply to all developments over 10 residential units or 1000 sq / m in the case of non-residential developments. This is the government’s definition of ‘major development’.</p> <p>Policy P2 – <u>due to the unique pressure on public open space in this Central London environment, there should be a policy which addresses the effect that major developments (of any land use) can have in exacerbating existing pressure on publicly accessible open space. This policy applies to all developments over 10 residential units or 1,000 sq. m. in the case of non-residential developments. This is the Government’s definition of “major development”.</u></p>	<p>intensification of the area. The Examiner has recommended modifications to P2 and the supporting text.</p> <p>It is considered that the draft policy as proposed to be modified will not result in any negative impacts on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area as the policy may help deliver health and well-being benefits associated with open spaces . The provision of improved and/or additional open space helps to improve mental, emotional and physical health and well-being, particularly for those equalities groups at greater risk of ill-health.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, socio-economic groups and those with English as a second language is considered to be neutral.</p>
<p>P3: Green Roofs</p> <p>a. <u>Subject to the character of surrounding built form, roofs should be flat where possible feasible, and a significant proportion of the roof area should comprise an extensive green roof, accessible to the occupants of the building be designed to include roof planting. The roof area should be accessible to occupants of the building, subject to safety and amenity considerations.</u></p> <p>b. If developers demonstrate that they cannot <u>Where it can be demonstrated that it is either inappropriate or not feasible to meet the requirement in P3a, a range of alternative climate change mitigation approaches must be considered, and implemented where feasible. they should make efforts to identify suitable flat roofs on existing buildings in the neighbourhood area to retrofit an extensive green roof.</u></p>	<p>P3 seeks to maximise the provision of green roofs and measures to mitigate the effects of climate change. The Examiner has recommended modifications to P3 and the supporting text.</p> <p>It is considered that the policy as proposed to be modified will not result in any negative impacts on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area. The provision of green roofs provides health and well-being benefits, while encouraging increased use of green spaces, making people feel safer and be healthier. It is considered that green roofs, subject to the character of surrounding built form and safety and amenity considerations will provide significant positive effects on health and well-being for users and occupiers of the site, and for those adjacent to the site. The ability to even just see green infrastructure contributes</p>

<p>c. Should developers demonstrate that they cannot meet the requirements of P3a and P3b, a range of other climate change mitigating approaches must be considered, including mosses and lichen, intensive green roofs.</p> <p>Rationale for sub sections:</p> <p><i>P3b. An extensive survey of the area was carried out in 2012 for the South Bank and Waterloo Business Improvement Districts by LRS Consultancy, which assessed roofs in the neighbourhood area for their ability to accommodate green infrastructure. This document may be used to identify potential targets for green roofs, funded by developers in the event that they are unable for specific reasons to deliver green roofs for their own buildings (e.g. if for engineering reasons, roofs cannot be flat). An alternative climate change mitigation approach might, subject to all townscape and viability considerations, include the potential for securing additional green roofs on existing buildings in the neighbourhood area. The Green Infrastructure audit may be accessed here: www.wearewaterloo.co.uk/service/planting-greening</i></p>	<p>to a sense of well-being and has beneficial impacts on health and environmental amenity.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, socio-economic groups and those with English as a second language is considered to be neutral.</p>
<p>P4: All major developments must <u>should be encouraged</u> to meet the following criteria:</p> <ul style="list-style-type: none"> a. <i>Include amenity space designed for the exclusive use of occupants. This should be provided primarily on levels away from the ground floor, for example via green roofs and terraces. Some ground floor private amenity space may be provided for the exclusive use of the building's occupants, but the majority of ground floor open space should be publicly accessible.</i> b. <i>Ensure that the design of publicly accessible open space incorporates public seating and enables ease of pedestrian movement.</i> c. <i>Have regard to 'Guidance for developers' document in Appendix 9.</i> d. <i>Address and mitigate any temporary major loss of amenity in surrounding public open space during construction phases</i> 	<p>P4 seeks to ensure major developments provide amenity space for occupants, ensures public open space provides public seating and encourages pedestrian movement and mitigates temporary loss of amenity trees. The Examiner has recommended modifications to P4 and the supporting text with regards to mitigation measures and the loss of trees.</p> <p>It is considered that the draft policy as proposed to be modified, will not result in any negative impacts on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area. The policy may help deliver positive health and well-being benefits.</p> <p>Provision of amenity space and green roofs can provide health and well-being benefits, while encouraging increased use of green spaces, making people feel safer and be healthier. It may have a positive effect by helping to improve mental, emotional and physical health and well-being for users and occupiers of the site, and for those adjacent to the site. The ability to even just see green infrastructure contributes</p>

through financial compensation, ring-fenced for green infrastructure projects to be delivered in the neighbourhood area, and. There may be other appropriate measures which could mitigate such major loss of amenity.

- e. *The impact of development on trees is addressed elsewhere in the development plan. Where it is impracticable to identify suitable locations for new trees, alternative forms of replacement or compensation – for example on-street planters, rain gardens and green walls – could be considered acceptable. Mitigate loss of any trees. Where trees must be replaced as part of redevelopment:*

- i. ~~*replacement trees should be planted according to the advice of a Council or independent arboricultural adviser with reference to the guidelines referred to in policy P4C,*~~
or
ii. ~~*the CAVAT model should be applied to provide compensation, ring-fenced for implementation of equivalent green infrastructure near to site.*~~

Rationale for sub sections

P4d. The neighbourhood forum suggests a simple formula to determine the compensation which would be paid towards green infrastructure projects in the area. Coin Street Community Builders advertises a number of spaces for hire on the Coin Street estate. The cheapest of these by square metre is Doon Street Car Park, which is away from the riverside, which is priced at approximately £1 per square metre per day.*

Should construction work be predicted to have an impact severe enough to prevent the reasonable enjoyment of any publicly accessible open space, the developer can be deemed to have taken it out of public use and should in effect lease it at the rate of £1 per square metre per day for the period of the impact. This funding should be used for improvements to green spaces in the neighbourhood area. Lesser impacts or impacts over a smaller area may still trigger compensation at a lower rate, as determined by the planning

to a sense of well-being and has beneficial impacts on health and environmental amenity.

The provision of seating and other types of outdoor furniture/amenities together with strategically thought out landscaping to attract people to use these spaces may improve mental, emotional and physical health and well-being, as well as benefiting children and young people, older persons and those with a disability who may need a place to rest. Requiring developments to consider the design of publicly accessible open space, particularly the ease of pedestrian movement, may have a positive impact on those who have a disability and those with children. Developers will be required to think about whether spaces are fully accessible, which may benefit wheelchair and pushchair users when they are living, working or visiting the neighbourhood area.

The draft policy that underwent examination potentially allowed the loss of trees for their monetary value. This may have had a negative impact on protected characteristics. However, the draft policy as proposed to be modified may have positive impacts on protected characteristics. Trees and vegetation are recognised in their ability to help alleviate stress, which will be beneficial for people's health. Trees and other green measures promote social and health and well-being benefits and can also help to improve air quality by filtering particulates which is likely to help those with respiratory conditions, older people and children. Furthermore, older people, especially over 75 years old, or those living on their own who are socially isolated, or in a care home are at greater risk of heatstroke. Planting trees and vegetation and the creation of green spaces to enhance evaporation and shading can make the environment cooler and reduce this risk.

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<p><i>committee. Impacts are likely to be limited to light pollution, dust and noise created by construction.</i></p> <p><u><i>The above formula is merely a suggestion, and should not be seen as prescriptive. There may be other appropriate measures which could mitigate major losses of amenity in surrounding public open space.</i></u></p> <p><u><i>The impact of construction on the amenity of such open space should be assessed on a case by case basis.</i></u></p> <p>Appendix 9:</p> <p>Introduction</p> <p><i>SoWN is especially short of open green space, and in the absence of sites which can provide large scale parks, it is especially important that small schemes help to provide green infrastructure in meeting our first thematic objective.</i></p>	
<p>P5: Air Quality</p> <p>a. <i>Given the high levels of air pollution in the area, development plans-proposals must show how they contribute to the improvement of air quality in South Bank and Waterloo. Such measures include, but are not limited to:</i></p> <ol style="list-style-type: none"> <i>i. Replacement of developments incorporating car parking with car free developments and electric vehicle charging points, or such other technology which encourages the take up of sustainable transport</i> <i>ii. Incorporation of air filtration systems to improve indoor air quality for occupants</i> <i>iii. Implementation of green infrastructure</i> <i>iv. The use of low-pollution vehicles during construction</i> <i>v. Freight consolidation arrangements</i> <p>b. <i>The neighbourhood plan has identified a network of pedestrian routes ('greenways') through the area which are situated away from heavy traffic, air pollution and noise (shown in Appendix 10). The plan supports developments along these routes which:</i></p>	<p>P5, as proposed to be modified, seeks to ensure developments in the Neighbourhood Area contribute to improving air quality and encourage green pedestrian and safe cyclist routes. The Examiner has proposed minor modifications to P5 and the supporting text.</p> <p>It is considered that the draft policy will not result in any negative impacts and may deliver positive impacts to the health and well-being of those within the South Bank and Waterloo Neighbourhood Area. There may be positive impacts on age, disability, socio-economic groups and pregnancy/maternity.</p> <p>Air quality is a severe problem in many parts of the Neighbourhood Area, affecting the health of many people of varying ages. The London Plan Integrated Impact Assessment (November 2017) notes that the health impacts of air pollution can include an increased risk of early death, as well as whole-life impacts on lung function, lung health and increased susceptibility to cardiovascular diseases, respiratory cancer, stroke, asthma and COPD. The impact of poor air quality is greater for those with lower socio-economic status, older people, children and those with existing health concerns. Improving air quality in the Neighbourhood Area will provide significant health benefits, helping to</p>

1. *Create an improved, pedestrian friendly streetscape, encouraging walking as the primary mode, as set out in local and TfL guidance'*
 2. *Contribute to an improvement in air quality and a reduction in noise levels*
- c. *Measures to encourage cycling will be explored, especially via routes that seek to protect cyclists from heavy traffic, air pollution and noise.*
- d. *Development of Waterloo Station will not be supported unless measures are introduced to restrict diesel taxis and diesel freight vehicles serving the Station. Development of Waterloo Station should demonstrate that any measures capable of being regulated by development management, to reduce emissions from diesel vehicles, have been investigated.*

Rationale for sub sections

P5b. The resident and business communities both describe a demanding environment in the South Bank and Waterloo neighbourhood, which is often suffered rather than enjoyed. Air pollution, noise, dirt, a lack of space to walk, and conflict with vehicles and bicycles regularly feature in these descriptions. In the same way as the Mayor of London has developed a network of Cycle Quietways intended for those who are not confident cycling on heavily trafficked main roads, SoWN has developed a network of streets – Greenways – which are designated as zones primarily for walking.

These streets will develop as places where traffic is less prevalent, or altogether absent; they will be quiet, less polluted, feature green pockets in which to rest, and will have wide pavements to encourage walking. Equally, they will be developed so as to provide a grid of streets which run in parallel to key desire lines, allowing pedestrians the choice to take Greenways rather than polluted streets as their walking routes.

Evidence collected by SoWN and King's College showed pollution levels at 50 – 60% more than parallel streets which were less heavily trafficked. This evidence forms the basis for the policy which aims to

improve mental, emotional and physical health and well-being for users. Requiring developers to incorporate air filtration systems to improve indoor air quality for occupants may have a positive impact on those with lower socio-economic status who are more likely to live on main roads and in areas with poorer air quality. It will also benefit older people, children and those who are pregnant. The draft policy supports pedestrian routes via greenways and encouraging cycling via protected routes will benefit the health and well-being of users by encouraging them to use active transport measures and reducing noise and pollution levels which can help to alleviate stress and improve mental well-being. Green measures promote social and health and well-being benefits and can also help to improve air quality by filtering particulates which is likely to help those with respiratory conditions.

The proposed modification to P5d replacement of P5d may contribute to positive impacts on the health of persons within the neighbourhood area by seeking to reduce diesel vehicle emissions, where possible.

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<p><i>protect a small network of streets from development which could increase pollution, and reduce opportunities for pedestrians to reduce their exposure to health damaging air.</i></p> <p><i>Those who wish to develop on this network of streets will need to meet certain standards. Their developments will assume the minimum of car use and the maximum walking and cycling. Buildings will need to have particular regard to the degree to which they will require servicing from vehicles, taxis etc, will need to mitigate noise to a higher standard, and will need to provide green infrastructure which improves air quality. They will also need to be stepped back from the road.</i></p> <p><i>In addition, developers will need to contribute to the improvement of the streetscape, either via a Section 278 agreement or through a CIL sum which contributes to a larger fund. This will enable the relaying of wider pavements, noise reducing highways surfaces, the implementation of seating and street trees, and the other elements which encourage people to walk through the area, as set out in the guidance. Ground floor units should be primarily A1, A3 and sui generis cultural uses. <u>Ground floors should reflect Greenways principles, and uses should not detract from the streets' function as peaceful walking routes.</u></i></p> <p><i>Further detail is provided in Appendix 10.</i></p> <p><i>P5c. <u>P5d.</u></i></p>	
<p><i>P6: The utilisation of vacant development sites with planning consent for temporary activity such as sports pitches and food growing is encouraged. All major proposals must be accompanied by a construction and phasing plan that identifies opportunities for temporary uses, both community and commercial. Where planning permission is required to bring sites into temporary use, this will normally be supported.</i></p>	<p>P6 seeks to use vacant, available land (where planning consent for temporary uses has been granted) for sports pitches and food growing. No modifications to this policy are proposed.</p> <p>The use of sites for temporary activity such as sports pitches may help to improve physical health, helping people be healthier for longer and live an inclusive and active lifestyle. It may also support improved physical and mental health of local people, in particular young people, with opportunities to engage in sport often leading to reduced opportunities to engage in antisocial behaviour and in contrast,</p>

	<p>promoting more social cohesion and improve positive mental wellbeing.</p> <p>The encouragement of food growing may enable the local community in the neighbourhood area to access to cheaper or even free fruit and vegetables which may benefit lower socio-economic groups, and improve health and social inclusion/sense of community.</p> <p>The impact on sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment and those with English as a second language is considered to be neutral.</p>
<p><u>Housing</u></p>	
<p>P7: New affordable housing made available for the following target groups would be supported:</p> <p><i>i. Low to middle income people working within the neighbourhood area</i></p> <p><i>ii. Elderly people from the area including those in need of live-in care</i></p> <p>Rationale for policies</p> <p><i>Policy P7—The housing market in the neighbourhood is largely either social rented or high end housing. Proposals are needed which contribute to a greater mix in the community, including allowing for people to grow old in the neighbourhood, (freeing family housing up for those that need it), and providing for those who work in the area.</i></p> <p><i>SoWN recognises that land values in the neighbourhood area make delivering truly affordable housing for the target groups difficult to achieve. Policy P8 gives examples of ways in which developers can bring forward affordable units which are acceptable to the community, whose first priority is to ensure a mix of local residents.</i></p> <p>(Page 8) Housing</p>	<p>Draft policy P7 which underwent examination sought to ensure new affordable housing is made available for low to middle income earners working within the Neighbourhood Area and elderly people including those in need of care. The policy was likely to have negative impacts on protected characteristics.</p> <p>The Examiner recommends the deletion of this policy and subsequent supporting or associated text throughout the Neighbourhood Plan as this policy is inconsistent with National policy and guidance and the Development Plan. Paragraph 47 of the NPPF (2012) imposes a duty on each planning authority to meet its full need for affordable housing in its Housing Market Area (HMA). The Examiner notes that the Neighbourhood Plan area is not an HMA and there is no quantitative evidence to support the assertions that there is a particular need of a particular type for affordable housing in the Neighbourhood Plan area.</p> <p>The Examiner noted that draft P7 implies that it would not support affordable housing that is not made available for the specified target groups.</p>

		<p>The Lambeth Strategic Housing Market Assessment October 2017 identifies the need for affordable housing in Lambeth, including the needs of different groups. The SHMA identifies:</p> <ul style="list-style-type: none"> • Population projects suggest that the number of people and households aged over 65 in Lambeth will increase significantly over the next 20 years. Lambeth has a significantly higher proportion of older people (aged 65+) in social rented accommodation than both London and England and a lower proportion of owner-occupiers. • There are nearly 500 applicants on Lambeth's housing waiting list that have been assessed as having some level of mobility need, 39 of which have been assessed as requiring a wheelchair accessible property. • Lambeth has a higher proportion of family households living in social rented housing (51 per cent) than in London (31 per cent) and a correspondingly lower proportion in owner-occupied housing. <p>The council proposes to accept the modification to delete P7. If the policy remained in the draft neighbourhood plan, it is considered there would be negative impacts on protected characteristics as the policy may restrict some groups' access to affordable housing in the neighbourhood area. Whilst the draft policy sought to increase affordable housing provision for those on low to middle income workers in the neighbourhood area and older people including those need of live in care, it would have a negative impact on other groups in need of affordable housing such as those with a disability, ethnic groups and those with children.</p> <p>Lambeth's strategic policy approach to affordable housing exists to meet housing need at a borough-wide level and does not seek to ring-fence homes for those already in a particular area. If housing policy is framed towards providing one type of product, there is a risk that that is all developers will offer, at the expense of wider housing need.</p>
Local Issue	Summary of Policy	
<i>Certain groups of people are particularly vulnerable to being unable to access housing in the area.</i>	<i>Affordable housing should be made available for older people, including those who need live-in support, key workers, and staff in sectors such as hospitals and retail which are struggling to recruit people who can afford to live nearby.</i>	
<i>Sales values mean that affordable housing isn't affordable for people on lower and middle incomes.</i>	<i>Smaller than usual flat sizes can be developed if they are well designed and are accompanied by facilities such as communal laundry and dining areas.</i>	
<i>New forms of housing should be provided to increase the sense of community.</i>	<i>Developers should build more cohousing and co-ops. Underneath flats, community retail should provide work for residents above.</i>	

		<p>It is consider the impact on sex, faith/belief, sexual orientation, marriage/civil partnership, gender reassignment, health and those with England as a second language is neutral.</p>
<p>P8: Proposals which incorporate features to accommodate one or more of the target groups identified in P7 will be supported. These include, but are not limited to:</p> <p>i. Co-housing</p> <p>ii. Unit sizes that maximise space and affordability by closely aligning with minimum space standards The London Plan</p> <p>Rationale for policies</p> <p>Policy P8— Given that national policy is that affordable rents are up to 80% market rates, reducing unit sizes to the minimum standards set out in the London Plan may be one of the few opportunities to preserve mixed communities in the neighbourhood. However, smaller unit sizes must be accompanied by exemplary design which supports communality, such as external dining and laundry facilities.</p> <p>Co-housing, which combines private units with elements of shared space or services is appropriate for inner city neighbourhoods, creating civic engagement and reducing social isolation. A significant proportion of housing in Waterloo is based on co-operative and co-housing principles and the Neighbourhood Forum supports this within the parameters of local plan policies on size and tenure.</p> <p>(Page 8) Housing</p>		<p>Draft policy P8 which underwent examination sought to support co-housing and unit sizes that maximise space and affordability by closely aligning with minimum space standards. It is linked to P7 and would therefore have the same negative impact on protected characteristics.</p> <p>The Examiner recommends the deletion of this policy and subsequent supporting or associated text throughout the Neighbourhood Plan as the policy seeks to unnecessarily duplicate Development Plan objectives and policies. Furthermore, the term “closely aligning with minimum space standards in the London Plan” is uncertain and inconsistent with the London-wide approach to minimum space standards in the London Plan. Housing that does not meet the minimum space standards has the potential for negative impacts on health and wellbeing due to poor quality of housing. This is likely to have greater impact on those with families, those with disabilities and lower socio-economic groups.</p>
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	<i>struggling to recruit people who can afford to live nearby.</i>	
<i>Sales values mean that affordable housing isn't affordable for people on lower and middle incomes.</i>	<i>Smaller than usual flat sizes can be developed if they are well designed and are accompanied by facilities such as communal laundry and dining areas.</i>	
<i>New forms of housing should be provided to increase the sense of community.</i>	<i>Developers should build more cohousing and co-ops. Underneath flats, community retail should provide work for residents above.</i>	
<p>P9: Where <i>in exceptional circumstances</i> affordable housing cannot be delivered on site, consideration should be given to making land in the neighbourhood area available to a local designated Community Land Trust to bring forward affordable housing in partnership with a registered housing provider.</p> <p>(Page 8) Housing</p>		<p>P9 seeks to address the off-site provision of affordable housing by involving a local designated Community Land Trust. The Examiner has recommended a minor modification to the policy to clarify that is only acceptable in exceptional circumstances.</p> <p>The provision of affordable housing is considered to be positive on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language.</p>
Local Issue	Summary of Policy	
<i>Certain groups of people are particularly vulnerable to being unable to access housing in the area.</i>	<i>Affordable housing should be made available for older people, including those who need live-in support, key workers, and staff in sectors such as hospitals and retail which are struggling to recruit people who can afford to live nearby.</i>	
<i>Sales values mean that affordable housing isn't affordable for people on lower and middle incomes.</i>	<i>Smaller than usual flat sizes can be developed if they are well designed and are accompanied by facilities such as communal laundry and dining areas.</i>	

<p>New forms of housing should be provided to increase the sense of community.</p>	<p>Developers should build more cohousing and co-ops. Underneath flats, community retail should provide work for residents above.</p>	
<p><u>Delivery of affordable housing</u></p>	<p><u>Where, exceptionally, off-site affordable housing is an option, delivery via a Community Land Trust may be considered.</u></p>	
<p>Housing: Other guidance</p> <ol style="list-style-type: none"> 1. Residential development should provide high quality homes which are designed to encourage well-maintained permanent use. Housing should not be developed as a liquid asset but to provide mitigation of the UK housing shortage. Housing developments should be marketed to prospective buyers in the UK before they are marketed overseas. 2. SoWn seeks a community solution to the shortage of affordable housing, aiming for a management structure which enables local ownership and oversight of housing. There should be more local control over housing (e.g. co-ops, community land trusts, neighbourhood housing agencies), with the ability to raise additional funding. Developments that create such arrangements will be welcomed by the community. 3. It is essential to encourage innovative new approaches to form, design and management which address local context and local need. 4. Although largely outside the role of the planning system, new approaches are needed to protect tenants in the private rented sector, including both incentives and penalties for landlords. Boroughs should support such measures as set out in the DCLG's Rogue Landlords discussion paper. 		<p>The Examiner has recommended a minor modification to the Housing: Other guidance text to align with proposed modification to the text in Development Management: Other guidance.</p> <p>The impact of this modification on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language is considered to be neutral</p>

5. *Following the example of Westminster and Enfield, Lambeth and Southwark should also consider the purchase of properties in the area to house vulnerable people, reducing revenue costs in the long term.*

6. *A key issue among local people is the extent to which developers are able to meet the targets set by the local authority on affordable housing levels. These are justified on the basis of 'viability assessments' which can assert that developments are not viable if they must provide the level of affordable housing the local authority requires. However, if viability assessments underestimate sales values and developments later make a larger profit than estimated, a mechanism should be developed which allows the council to 'claw back' funding retrospectively to deliver more affordable housing. These sums should fund affordable housing in the neighbourhood area where possible. The development proposals of charities and public bodies should be exempt from this obligation.*

A number of councils, including Southwark and Lambeth are now producing Viability Assessment SPDs, which seek to address this issue and argue for the clawback mechanism, and that assessments justifying fewer affordable housing units should be open to public scrutiny. The neighbourhood forum supports the objectives of these SPDs.

Development management

P10: *Any hotel proposal must mitigate the development's impact on the existing dynamics of the residential, business and social communities, ~~including~~. The following objectives will be supported:*

1. *Provide as much retail frontage as possible to a high street, where the units made available only have high street access.*

P10 seeks to mitigate impacts from hotel development on existing residential, business and communities by providing retail frontage to high streets (where possible), providing accessible community space, minimal 'in-house' food and drink options to encourage use of local

<ol style="list-style-type: none"> 2. <i>Provide space that is beneficial and available to the wider community such as 'incubator space', screening room, community meeting and function rooms, fitness suites and swimming pools.</i> 3. <i>Where possible any 'in-house' food and beverage offer should be limited (minibars, bars, restaurants and cafes closed to the public) so that hotel guests are encouraged to use local traders.</i> 4. <i>Developments should continue to engage with local recruitment mechanisms to ensure local candidates are employed wherever possible.</i> 	<p>facilities and local job opportunities. The Examiner suggests a minor modification to this policy.</p> <p>It is considered that P10 as proposed to be modified may result positive benefits for some protected characteristics in the neighbourhood area. For example, requiring space for community use may benefit groups who are more likely to use community facilities such as older people, those with disabilities and those with children. The provision of accessible community spaces and facilities, including for fitness, meeting and social purposes, supports improved physical and mental health of local people, particularly those who may be unable to access such spaces due to costs.</p> <p>The provision of jobs that are accessible to local people benefits young people, the unemployed, those from BME groups, and lower income communities in particular, who may have more limited access to education and employment opportunities. It may also, by providing localised employment, benefit equalities groups such as women and parents in terms of offering a better work and domestic life balance.</p> <p>The impact on faith/belief, sexual orientation, marriage/civil partnership, gender reassignment and those with English as a second language is considered to be neutral.</p>
<p><u>P11: The facades of all new developments should be treated with a permanent anti-graffiti coating. Where they front publicly accessible spaces the ground floor (and any relevant upper floor) elevations of new development shall be treated with a permanent anti-graffiti coating which shall be maintained for the lifetime of the development.</u></p>	<p>P11 seeks to ensure graffiti in the neighbourhood area is mitigated and minimised. The Examiner suggests modifications to the policy.</p> <p>It is considered that the impact of the draft policy as proposed to be modified on all protected characteristics is neutral.</p>
<p>Development Management: Other guidance</p> <p>1. A key issue among local people is the extent to which developers are able to meet the targets set by the local authority on affordable housing levels. These are justified on the basis of 'viability assessments' which can assert that developments are not viable if they must provide the level of affordable housing the local</p>	<p>The proposed modification to the associated Development management text recommends re-inserting item 1 under the 'Housing' heading where it is deemed more appropriate.</p>

~~authority requires. However, if viability assessments underestimate sales values and developments later make a larger profit than estimated, a mechanism should be developed which allows the council to 'claw back' funding retrospectively to deliver more affordable housing. These sums should fund affordable housing in the neighbourhood area where possible. The development proposals of charities and public bodies should be exempt from this obligation. A number of councils, including Southwark and Lambeth are now producing Viability Assessment SPDs, which seek to address this issue and argue for the clawback mechanism, and that assessments justifying fewer affordable housing units should be open to public scrutiny. The neighbourhood forum supports the objectives of these SPDs.~~

2. The community believes that early consultation on major developments would enable them to provide helpful advice and reduce the likelihood of objections. To provide a mechanism to strengthen the Councils' commitment to 'front-loading' local consultation, a local 'development review panel' should be established to scrutinise major development plans at pre-planning stage, against their adherence to neighbourhood plan and other matters and make recommendation to the planning committee, including S106 mitigation and CIL spend. This would apply to applications undergoing pre-planning consultation and would be written into planning performance agreements. Plans would be submitted by the Councils to the panel with strict time limits on comments so as not to delay the planning process.
3. 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.
4. ~~SoWLN accepts that strategic site allocations will be undertaken in the Borough's Local Plans. However, conference with the~~

The proposed modification to remove item 5 seeks to ensure Local Plan review processes are upheld for the purposes of consultation and site allocation reviews.

The impact of this modification on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language is considered to be neutral.

<p>neighbourhood forum should allow for input into elements / detail of the LPA's recommendations for the site. SoW/N will work with Lambeth and Southwark Planning Authorities so that local aspirations are reflected in the policy frameworks for particular sites including:</p> <ul style="list-style-type: none"> i. — Guy's and St. Thomas' Charity Estate ii. — 'Triangle site' bounded by Sandell Street, Waterloo Road and Cornwall Road iii. — Cornwall Road bus garage iv. — OCCC Estate v. — Waterloo Station vi. — ITV and London Studios vii. — 89 Westminster Bridge Road <p>5. <i>The area's heritage is valued and reflects a complex mix of social infrastructure, architectural character and use. The neighbourhood plan acknowledges existing conservation and character areas and supports their significance in ensuring the character of the area is respected. High quality design, related to context, is required of all development proposals.</i></p>	
<p><u>Retail & work</u></p>	
<p>P12: <i>Within appropriate locations for retail uses, The Neighbourhood Plan supports proposals that provide retail units with the following characteristics:</i></p> <ul style="list-style-type: none"> <i>i. Interiors fitted out to RIBA category B standard and made available for temporary or pop-up use</i> <i>ii. A range of unit sizes including units with shop floors under 20 sq / m</i> <p>Rationale for policies</p> <p><i>Policy P12 – New businesses, entrepreneurs and pop-ups are unable to fund the costs of fit out, even where empty units are affordable.</i></p>	<p>P12 seeks to ensure retail units are of a size and fit-out that is available to small, pop-up uses. The Examiner suggests minor amendments to the supporting text of this policy to remove the requirement to developers to provide affordable retail units.</p> <p>The provision of flexible workspace suitable for micro, small and medium enterprises increases availability of workspace for specific social, cultural or economic purposes. This may encourage younger persons or those with a lower socio-economic status looking to start their own businesses with the opportunity to do so, thereby creating a positive impact on those protected characteristics.</p>

~~Developers should ensure units are ready to trade from and offer them up at a discounted rent to young businesses if there is a delay while permanent tenants can be identified. Developers should work with the planning authority and community to identify tenants for six month affordable leases should units not be let three months after completion.~~

~~Units should be provided with the following, to enable temporary or pop-up uses~~ The following facilities to enable temporary or pop-up uses will be encouraged:

- Walls painted white or temporary walls installed to cover up any that are damaged
- Simple overhead lighting ideally spot lighting with different controls so tenants can adjust the lighting state as required
- As much glass frontage as possible
- Power sockets throughout
- WiFi, water and electricity connected
- Access to a toilet
- Buildings insurance

These characteristics were advised after consultation with experts We Are Pop Up, who identify temporary retail spaces for small start-ups at low cost. We Are Pop Up also advise that units should be provided which enable smaller retailers to share space – e.g. a room with a ‘shelfshare’ arrangement or a series of kiosk-style spaces with shared services. The local community would encourage such approaches.

(Page 9) Retail & work

The impact on sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health and those with English as a second language is considered to be neutral.

Local Issue	Summary of Policy
Small independent shops like the ones on Lower Marsh are being priced out of the area by rising rents.	Big developments should provide a certain number of affordable retail units. Empty units should be available cheaply on a temporary basis while longer-term tenants are identified.

<p><u>The need for small, flexible and temporary shops</u></p>	<p><u>Proposals for small, flexible and temporary shops will be supported.</u></p>	
<p>There is a lack of office space in the area and new companies can't set up here.</p>	<p>Developers should provide flexible, affordable workspace and office units</p>	
<p>Lower Marsh Market needs support to grow.</p>	<p>Development on Lower Marsh should contribute to improvements to infrastructure for the market.</p>	
<p>P13: In the Lower Marsh and The Cut CAZ retail frontages, planning applications will be required to:</p> <ul style="list-style-type: none"> a. Retain an appropriate mix of retail units, taking particular note of the following: <ul style="list-style-type: none"> i. Planning applications involving the loss of an A1 unit will not be supported unless the overall percentage of A1 units remains above 50% following its loss. ii. Planning applications involving the loss of an A3 unit will not be supported unless the overall percentage of A3 units remains above 30% following its loss. b. Retain and enhance the retail use of the frontages, taking particular note of the following: <ul style="list-style-type: none"> i. Conversion from retail to residential on these streets will not be permitted; and ii. Applications to convert ground floor residential units to A1 or A3 use will be supported* <p><i>*With the exception of the purpose built housing such as New Cut Housing Coop and Styles House.</i></p> <p>Rationale for policies</p> <p>Policy P13 – Lower Marsh and The Cut – The CAZ street frontage is protected in the Waterloo SPD and Southwark also designate the Southwark section of The Cut as a protected shopping frontage. In the Lambeth Section of the street, conversions to non-A1 uses have not</p>		<p>P13 seeks to ensure a specific mix of retail units and frontages is maintained in Lower Marsh. The Examiner recommends a minor modification to this policy and to the supporting text so that it applies only to Lower Marsh.</p> <p>Protecting a proportion of retail units will support the retention of local shops and services, providing a positive impact on groups such as older people, those with a disability or those with children who need to access these shops and services but may find it harder to travel or access shops and services due to these characteristics.</p> <p>The impact of this modification on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language is considered to be neutral.</p>

<p>been resisted where current policy states that only 50% of those frontages should remain as A1.</p> <p>The local community, whilst recognising and welcoming a general shift towards a combination of A3 restaurant uses as well as A1 retail uses, would like to strengthen existing policy to ensure that only a minority of premises are used as services. This preserves the character of the street as a shopping street with daytime as well as evening uses.</p>	
<p>P14: The neighbourhood will encourage schemes which provide office or workspace in appropriate parts of the area <u>Schemes will be encouraged which provide office or workspace with the following characteristics with the following characteristics:</u></p> <ul style="list-style-type: none"> i. Are able to be subdivided to encourage flexible use and co-working and / or ii. Include a range of unit sizes including offices of under 1000 sq / m and / or iii. Are able to provide accommodation for a range of jobs which are accessible to local people and / or iv. Commit to working with third party employment support providers and local schools to provide work placements, apprenticeships and training support for unemployed people. <p>Rationale for policies</p> <p>Policy P14 – Bishop’s and Cathedral’s Wards have a particular shortage of affordable and flexible office spaces. Flexibility is defined both in terms of physical adaptability and length of tenure. There is a need for office spaces which can be adapted as co-working space, shared between a number of smaller companies who are able to economise through shared services such as cleaning. There is also a shortage of large spaces for more established businesses.</p>	<p>P14 seeks to provide office or workspace in the neighbourhood area with specific characteristics, targeted at certain user groups. The Examiner suggests a minor amendment to this policy to remove ‘in appropriate parts’, and to the supporting text so that it is consistent with strategic policy which supports office and employment uses in the neighbourhood area.</p> <p>The provision of flexible or co-working spaces may provide suitable locations for micro, small and medium enterprises, benefiting start-up businesses, creative businesses and not for profit and/or charitable organisations. This may include education providers and organisations whose primary purpose is to support disadvantaged groups and tackling economic inequality through Lambeth’s creative and digital industries (CDI) economy.</p> <p>The provision of job accommodation for jobs that are accessible to local people or that provide work placements, apprenticeships or training support for unemployed or school-aged persons are likely to benefit young people, the unemployed, those from BME groups and lower income communities in particular, who may have more limited access to education and employment opportunities. It may also, by providing localised employment, benefit equalities groups such as women and parents in terms of offering a better work and domestic life balance.</p> <p>It is considered that P14 as proposed to be modified may result in positive effects on protected characteristics in the neighbourhood area by helping to ensure local jobs go to local people, and that these people have the necessary skills to partake in the employment</p>

	<p>opportunities while addressing unemployment and poverty, including child poverty, as well as providing opportunities for young people (but not limited to just the young) to get work through apprenticeships.</p> <p>The Lambeth State of the Borough report (2016) notes that while employment in Lambeth has grown more slowly than the London average since 2002, self-employment, particularly amongst white male residents (aged 35 and over) has significantly increased since 2008. The report states that in 2014, unemployment in the borough was at its lowest in ten years, rising by an increase of only 6-7% in 2015. However, there is an identified gap in employment rates and incomes between white residents and those from black and ethnic minority backgrounds, with employment rates significantly higher for white Lambeth residents than those from Black and Minority Ethnic (BME) backgrounds. The year to June 2015 identifies that 85% of white working age residents were employed compared to 66% of BME working age residents, closely linked with the ethnic profile of areas within Lambeth. Providing office or workspace in the neighbourhood area with specific characteristics, targeted at certain user groups including can assist in a positive impact on ethnicity, allowing those identified from BME backgrounds greater opportunities for employment and skills.</p> <p>The impact on ethnicity, faith/belief, sexual orientation, disability, marriage/civil partnership, gender reassignment, health and those with English as a second language is considered to be neutral.</p>
<p>P15: <i>The neighbourhood will support proposals which enable physical infrastructure improvements to support the development and servicing of the street market at Lower Marsh, including:</i></p> <ul style="list-style-type: none"> <i>i. Electricity points</i> <i>ii. Storage</i> <i>iii. Refuse storage</i> <i>iv. Improved lighting</i> <i>v. Improved seating</i> <i>vi. Green infrastructure</i> 	<p>P15 seeks to ensure development in the Neighbourhood Area enables relevant infrastructure improvements to support the Lower Marsh street market. The Examiner has not proposed any modifications to this policy.</p> <p>Improved lighting, seating and green infrastructure is considered to have a positive impact on the protected characteristics of those within the South Bank and Waterloo Neighbourhood Area as the provision of improved and/or additional open space helps to improve mental, emotional and physical health and well-being, particularly for those</p>

	<p>equalities groups at greater risk of ill-health. The provision of seating and other types of outdoor furniture/amenities, including lighting, to attract people to use these spaces may improve mental, emotional and physical health and well-being of users, as well as benefiting children and young people, older persons and those with a disability who may need a place to rest.</p> <p>The impact on sex, ethnicity, faith/belief, sexual orientation, marriage/civil partnership, gender reassignment, socio-economic groups and those with English as a second language is considered to be neutral.</p>
<u>Social infrastructure & culture</u>	
<p>P16: <i>The Neighbourhood Forum has identified a number of sites or buildings which should be protected for specified community uses or their community significance. Proposals that will result in either the loss of, or in significant harm to, those community assets will not be supported.</i></p> <p>Rationale for policies</p> <p><i>Policy P16 – The Neighbourhood Forum has identified a number of community facilities which should be protected. Any proposals seeking the redevelopment of these sites should include full reprovision of the community use within the new development of The Neighbourhood Plan Area on the same site and providing equal or increased capacity to the original.</i></p>	<p>P16 seeks to protect specific sites or buildings for community uses or significance, including the Waterloo Action Centre, Living Space Community Centre and Make Space Studios. The Examiner has proposed minor modifications to the policy and supporting text.</p> <p>It is considered that P16 will provide a positive impact to all protected characteristics as community facilities provide benefit to a number of user groups by providing facilities to the community who may not normally have access, enabling them to maintain an active and healthy lifestyle and encouraging social interaction which benefits mental well-being. Furthermore, the provision of sites or buildings for community uses can benefit groups who are more likely to use community facilities such as older people, those with disabilities and those with children, while accessible community spaces and facilities, including for fitness, meeting and social purposes, supports improved physical and mental health of local people, particularly those who may be unable to access such spaces due to costs.</p>
<p>P17: <i>The Neighbourhood Plan recognises the contribution to the artistic and cultural distinctiveness of the area made by Leake Street and seeks to maintain and develop this important feature of the neighbourhood. Applications which contribute to and promote the use of adjoining areas for A1, A3, D1 and D2 units adjoining Leake Street</i></p>	<p>P17 seeks to recognise, contribute to and promote the artistic and cultural distinctiveness of Leake Street. The Examiner has proposed a minor modification to this policy to clarify where these uses will be supported in the neighbourhood area.</p>

<p><i>and under Waterloo Station for cultural uses will therefore be supported.</i></p>	<p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language is considered to be neutral.</p>
<p>Streetscape & transport</p>	
<p>P18: <i>Developments which create new public realm of a scale which requires pedestrian way finding should implement the Legible London way finding system (or replace defunct Legible London signage) in accordance with the Highways Act and relevant Highways Authority guidance.</i></p>	<p>P18 seeks to ensure pedestrian way finding is adequately signed (where required by scale) with the Legible London way finding system and the Examiner has not suggested any modifications to this policy.</p> <p>The Legible London way finding system has been developed with a range of organisations representing disability groups to ensure the Legible London design is as inclusive as possible, using maps to show steps, pavement widths and pedestrian crossings. This system is beneficial to user groups by ensuring that street names, landmarks and user facilities (including restrooms, escalators and lifts and baby changing facilities) are visually available. This system is identified as having a positive impact on those with a disability, pregnancy/maternity and those with young children.</p> <p>The impact on age, sex, ethnicity, faith/belief, sexual orientation, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language is considered to be neutral.</p>
<p>Policy & guidance: Planning gain & mitigation</p>	
<p>P19: <i>Subject to the requirements and implications of regulations 122 and 123 of the CIL Regulations, where developments create an ongoing and significant cost implication for the management and maintenance of the neighbourhood area outside the development's demise, revenue Section 106 funding to mitigate the impacts should be secured from the development.</i></p>	<p>P19 seeks to use Section 106 funding to mitigate the impacts from development on the neighbourhood area.</p> <p>This policy, including the minor amendment recommended by the Examiner, is considered to have a neutral impact on age, sex, ethnicity, faith/belief, sexual orientation, pregnancy/maternity, disability, marriage/civil partnership, gender reassignment, health, socio-economic groups and those with English as a second language.</p>

~~**P20:** The neighbourhood element of CIL generated in the area should where feasible be used to fund the projects set out in section 9 of the neighbourhood plan or other projects in consultation with SoWN.~~

Rationale for policies

~~Policy P20—Defrayal of the neighbourhood element of CIL should be in accordance with the projects set out in the neighbourhood plan. Prioritisation and updating of the projects list will be led by the community in consultation with Lambeth and Southwark Councils. This arrangement follows the example of the successful London Eye revenue, S106 agreement, which is defrayed annually by local people according to local need.~~

(Page 10) Planning gain & mitigation

Local Issue	Summary of Policy
<p>The area is poorly maintained and insufficient funding is available for local groups to help deliver improvements.</p>	<p>Part of Community Infrastructure Levy (a tax on development) should be used as revenue to support ongoing local efforts to improve the area, maintain social infrastructure and deliver the ambitions of the neighbourhood plan.</p>
<p>Local people feel removed from the decision making process when determining how proceeds from development should be spent.</p>	<p>A project list will be developed by the neighbourhood forum and evolve over the lifetime of the plan.</p>

(Page 10) Guidance & Projects

~~The plan also includes “non-policy” guidance for developers and local authorities, reflecting local aspirations. It also includes a list of projects —to be paid for via the local Community Infrastructure Levy— which are put forward by the community to realise the vision of the South Bank & Waterloo Neighbourhood Plan in the next 15 years.~~

Draft policy P20 that underwent examination sought to require the spending of the neighbourhood element of Community Infrastructure Levy on projects identified in the neighbourhood plan or on other projects in consultation with the neighbourhood forum. The Examiner recommended the deletion of this policy and associated supporting text as it is not a policy for the development and use of land.

If draft policy P20 were to be retained in the draft Neighbourhood Plan, it may have a negative impact on the protected characteristics by fettering the council’s spending of the neighbourhood element of CIL on projects that provide benefit to other groups not identified in the projects chosen by the South Bank and Waterloo Neighbours.

The council is producing a Cooperative Local Investment Plan (CLIP) that considers the needs of all of those within the local community and their priorities for investing the neighbourhood element of CIL.

(Page 13) Footnote 2

~~²The list of projects is a target list for the defrayal of the neighbourhood element of Community Infrastructure Levy (CIL). 25% of all CIL generated in the area must be spent in the area. The projects list where it applies to the Lambeth section of the neighbourhood also forms the Community Led Investment Plan (CLIP) for Bishop's Ward. A memorandum of understanding setting out the issues relating to the defrayal of CIL can be found in Appendix X.~~

(Page 19) Planning gain & mitigation

- ~~Securing mitigation of the impacts of development~~
- ~~Ensuring there is maximum community input into measures to mitigate the impacts of development and allocation of neighbourhood CIL~~

(Page 58) Social Infrastructure & culture: Other guidance

1. ~~CIL funding raised from development within the SoWN area and used for social infrastructure projects should only be allocated to non-profit distributing organisations operating in an area of benefit that covers the SoWN area, have appropriate charitable or social purpose objects and an asset lock (i.e. protections for the uses of the asset), ensuring that the majority of beneficiaries from the project (capital or otherwise) come from within the SoWN area of benefit. All funds should be restricted in use to the purposes applied for.~~
2. ~~A proportion of CIL generated annually from development within the SoWN area should be defrayed as revenue by a group representing the local community. This could include supporting existing projects, hiring fundraisers to support groups or setting up new projects.~~
3. ~~Initiatives which create jobs for local people are to be supported and could include provision of space to improve practical or vocational skills (particularly for older people and school leavers).~~

The community will support schemes which create sustainable ties between education providers and employers to strengthen local pathways into work.

- 4. SoWN welcomes and encourages culture and tourism as a valuable part of South Bank life. 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 socio-economic spread - and the impacts on the resident and business community of increased footfall, noise and disruption to quality of life / business as usual.*
- 5. On culture, 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. 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.*
- 6. There is a perceived gap between an 'affluent' South Bank and a 'deprived' Waterloo. Projects which strengthen ties between communities of different social economic status are to be encouraged.*
- 7. The South Bank is home to a wide range of cultural organisations and artists. Developers should consider supporting local artists and cultural organisations when developing their cultural strategy, implementing public or internal art and procuring creative services.*
- 8. Local people and organisations should be consulted on public art and culture planned as part of development.*

9. *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 maybe considered 'public benefit'.*

(Page 74) SoWN's Role

SoWN is the neighbourhood forum established under the provisions of the Localism Act, and recognised by both Lambeth and Southwark Councils as the designated body to prepare a neighbourhood plan for the designated area which contains parts of both Councils' administrative areas.

SoWN has some 500 members and is administered by an elected Steering Group of 32 including residents, employees, businesses, third sector organisations, public bodies and ward councillors, providing broad representation across the South Bank and Waterloo Community.

One of SoWN's prime objectives is to monitor the implementation of the Neighbourhood Plan, providing input into the priorities for s106 agreement obligations to mitigate the immediate impacts of developments, ~~and into decision-making on the allocation of the neighbourhood portion of CIL generated from developments in the SoWN area (and other sources of funding obtained).~~

SoWN's working groups have collaborated to develop a set of projects that are intended to act as targets for the neighbourhood portion of CIL and, where appropriate, S106 developer contributions. These projects are put forward by the local community and represent examples of locally supported projects which fulfil the policy objectives of this plan.

~~SoWN is committed to working with both Councils to develop appropriate arrangements and mechanisms through which the neighbourhood portion of CIL, S106 monies and other funding can be locally defrayed. It is envisaged that a formally incorporated local body will undertake the defrayal of the neighbourhood portion of CIL in~~

~~partnership with the Councils in line with the policies contained in this neighbourhood plan.~~

(Page 75) SoWN's Objectives

In line with the above, SoWN's objectives are more particularly to:

- *ensure there is local input into S106 agreements to mitigate the immediate impact of individual developments in the neighbourhood plan area, including where such agreements can support the projects list which forms part of the plan, in line with the plan's objectives, priorities and projects;*
- ~~*provide local input into ensuring that the neighbourhood portion of CIL is spent in line with the priorities and projects set out in the neighbourhood plan as provided for in relevant government and other guidance;*~~
- *play a leading role with both Councils in facilitating communication between the Councils, the community and relevant local bodies in reaching agreement on the expenditure of neighbourhood CIL, S106 funds and other funding to ensure that consensus is secured locally and the Councils have a clear single point of contact and information.*

Overall the EIA analysis demonstrates generally positive impacts on the protected characteristics in Lambeth. Where negative impacts have been identified, it is proposed to accept the examiner's recommendations to delete the identified policies.

How do you plan to promote and deliver any positive impacts of the proposal?

If successful at referendum, once 'made', the South Bank and Waterloo Neighbourhood Plan will form part of Lambeth's development plan, alongside the Lambeth Local Plan, the London Plan and any other neighbourhood plans made in the future. The EIA has identified that the Green infrastructure, open space & air quality policies (P1-P6), Development management policy (P10), Retail & work policies (P12-P15), Social infrastructure & culture policy (P16) and the Streetscape & transport policy (P18) in the draft neighbourhood plan may deliver positive impacts on protected characteristics.

The positive impacts identified in this EIA will be delivered through the decision-making process for planning applications in the neighbourhood area.

How do you plan to address and mitigate any negative impacts of the proposal?

Officers propose to accept the examiner's recommended modifications to the draft Neighbourhood Plan. These modifications mitigate the negative impacts of the Housing policies (P7-P8), and Policy & guidance: Planning gain & mitigation (P20) identified in this EIA.

How will you review/evaluate your proposal, mitigation actions and/or benefits? Who will be responsible for this?

If successful at referendum and then subsequently made, the draft Neighbourhood Plan will form part of Lambeth's development plan. However, it will be the responsibility of the neighbourhood forum to bring forward any review of the neighbourhood plan.

Outcome of EIA

Overall, it is considered that the draft Neighbourhood Plan, with proposed modifications, will not have an adverse impact on the protected characteristics, but rather a positive impact, particularly on the health and wellbeing of multiple user groups, those with a lower socio-economic status and some younger and older people.

Comments from Sponsor/Director/Head of Service