

## Results of pre-submission consultation

### South Bank & Waterloo Neighbourhood Plan, February 2017

South Bank and Waterloo Neighbours (SoWN) ran a consultation process between 28<sup>th</sup> November 2016 and 20 January 2017. This was publicised by letter to members and stakeholders, widespread email communications, social media and announcements at community events. Full details of the consultation were on our website, a consultation event took place on 16<sup>th</sup> January 2017 at the National Theatre. Full copies of the plan were also available at public buildings including Southwark and Lambeth Town Halls, the John Harvard Library, and Phoenix House. Respondents were able to feed back via:

- a) An online questionnaire
- b) A paper version of the online questionnaire
- c) By letter
- d) At consultation events

#### 1. Survey responses

There were 200 responses to the survey.

The questionnaire was produced as a number of statements. Respondents were asked whether they strongly agreed, agreed, neither agreed nor disagreed, disagreed or strongly disagreed.

The vast majority of responses were positive, with fewer than 4% of respondents disagreeing with any statements, and fewer than 2% strongly disagreeing. This reflects how the draft policies have been prepared following the results of previous consultations.

<b>Policy area</b>	<b>Summary of key issues/concerns</b>	<b>How the issues have been addressed</b>
Green Infrastructure, Open Space and Air Quality	<p>The following policies were all substantially supported by a majority of respondents:</p> <p>More green space is needed in the area</p> <p>Developers should replace any green space that they build on</p> <p>Developers should make at least half of any flat roof 'green'</p> <p>Developers should provide extra outside space for building tenants</p>	<p>Policies P1 – P4 all support the retention, improvement and further provision of green space. These include:</p> <p>Policy P1 requires that any developments which permanently reduce green space to provide new green space of better quality, amenity value or accessibility than the space which is lost.</p> <p>Policy P3(a) requires that a significant proportion of roofs of major developments should be green, or provide a commuted sum to retro-fit a green roof elsewhere.</p>

	<p>Developers should minimise the impact of construction on the surrounding area</p> <p>Developers should include places for the general public to sit</p> <p>Developers should provide details of their planting plans at an early stage</p> <p>Developers should make sure designs are 'water sensitive' to reduce localised flooding</p> <p>Developers should financially compensate communities where construction temporarily reduces access to green space</p> <p>Developers should replace all trees lost during construction</p> <p>Sites awaiting development should be made available for community growing or sports pitches</p> <p>Specific areas of green space should be designated 'not for development'</p>	<p>Policy P3(c) requires that major proposals must provide amenity space for the exclusive use of occupiers.</p> <p>Policy P3(e) requires developers to have regard to the 'Guidance for developers' document at appendix 8, which recommends additional seating be provided, planting be considered at an early stage and sustainable drainage.</p> <p>Policy P3(e) requires developers to have regard to the 'Guidance for developers' document at appendix 8. Paragraph 1 addresses climate change including sustainable drainage.</p> <p>Policy P3(f) requires that major developments address and mitigate temporary loss of major amenity during construction.</p> <p>Policy P3(g) requires developers to mitigate the loss of any trees, and to replace or provide compensation for nearby green infrastructure.</p> <p>Policy P4 encourages the temporary use of development sites for these purposes.</p>
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<p>Housing</p>	<p>The following statements were all agreed with by a majority of respondents:</p> <p>Housing should be prioritised for low-to-middle income people working within the neighbourhood</p> <p>Housing should be prioritised for older people from the area wishing to 'downsize' to smaller accommodation</p> <p>Housing should be prioritised for elderly people in need of live-in care</p> <p>Some smaller flats with communal facilities are acceptable if they create truly affordable housing</p> <p>I would support more co-operative (tenant managed) housing being built in the community</p> <p>I would support more co-housing (shared housing) being built in the community</p> <p>I would support more housing developments delivered by a local Community Land Trust</p>	<p>Policy P5 supports the provision of affordable housing for low to middle income workers, older people wishing to downsize and elderly people in need to live-in care.</p> <p>Policy P6 supports proposals for co-housing and developments which London Plan minimum unit sizes.</p> <p>Policy P7 suggests that where affordable housing cannot be provided on-site, land is given to a community land trust to bring forward housing.</p>
<p>Development Management</p>	<p>Around 50% supported the statement: I would support the building of further hotels only where they benefit the local community e.g. through local employment, community use of facilities etc.</p> <p>16% neither agreed nor disagreed, and 30% disagreed</p>	<p>Policy P8 requires that proposals for hotels will not result in a net loss of offices or homes, and will benefit the local community.</p>

Retail and Work	<p>The majority of respondents agreed with the following statements:</p> <p>There is a need for affordable and/or temporary shop units for young and independent businesses in the area</p> <p>There is a need for affordable and/or temporary shop units for young and independent businesses in the area</p> <p>Lower Marsh Market should be supported to grow</p> <p>45% agreed and 29% neither agreed nor disagreed with the statement:</p> <p>There is a need for more office space in the area, particularly which is flexible and affordable</p>	<p>Policy P9 supports proposals for good quality retail units in a range of sizes.</p> <p>Policy P10 supports the retention of A1 and A3 uses at Lower Marsh, resisting conversions to residential use and supporting intensification above shops.</p> <p>Policy P11 supports office and workspace which can be subdivided for flexibility, can accommodate a range of jobs, provides work placements, apprenticeships and training for unemployed people, and does not support the loss of office spaces larger than 1000m<sup>2</sup>.</p> <p>Policy P12 supports proposals to enable physical infrastructure improvements at Lower Marsh.</p>
Social Infrastructure and Culture	<p>The majority of respondents agreed with the following statements:</p> <p>I consider that Leake Street, linking York Road to Lower Marsh, should be preserved exclusively as a graffiti area</p> <p>I would support the protection of specific buildings in the area because of the importance of the activities which go on inside</p>	<p>Policy P13 does not support proposals which will lead to the loss of or significant harm to specified community assets.</p> <p>Policy P14 supports applications which contribute to and promote the D2 uses of the Leake Street and Waterloo undercrofts.</p>

Streetscape and Transport	<p>The majority of respondents agreed with the following statements:</p> <p>There is a need to create quieter walking routes through less polluted parts of the area</p> <p>There is a need for more signage in the area to help people find their way around</p> <p>Funding from developers should be used to maintain local parks, community buildings and services</p> <p>The local community should decide the priorities for financial investment in the neighbourhood</p>	<p>Policy P15 identifies a network of pedestrian routes or 'greenways' and supports the provision of a more pedestrian friendly streetscape and improvements in air quality and reductions in noise levels in these areas.</p> <p>Policy P16 requires new developments providing large areas of public realm to implement the Legible London way finding system.</p>
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See Appendix 1 for further analysis of survey data.

**General comments from respondents to the survey**

We are grateful to the 65 respondents who took the time to be a bit more discursive in this section than the other categories permitted. Below we have summarised as far as possible the flavour of these comments.

It was highly encouraging to note that the topic that featured the most was general approval for the plan itself (18 mentions).

“I hope we can promote some of the ideas put forward.” “Important that local people go on to work for the implementation of this plan.” “We need to think more about the whole area and I think this plan helps us do that.” “It is a strong, forward-looking document, with some excellent proposals.”

The topic of hotels in the area was next in frequency of mentions, with 12 negative views on future developments, ranging from the pithy (“no more hotels”) to more wide-ranging consideration, linking the proliferation of hotels to the increasing standardisation of the retail offer. 2 views were more favourable, one highlighting the economic and employment benefits, the other accepting the advantages of facilities that could be provided for local use.

A few of those who commented on hotels linked their remarks to a more general sense that the retail offer in the area seems to be becoming increasingly standardised and less oriented to the needs of the local community (8); a further 3 regretted the absence of a proper supermarket and 1 a laundry.

This approach might in turn be linked to a number of respondents who felt the community itself to be under threat: “how about supporting the local community that have lived and put into the community for many years....we too need affordable housing as we are getting priced out of the rental market.” “Housing should be prioritised for those who grew up locally.” Local housing was mentioned by 6 people as a specific concern, but for as many others a less specific sense that the increasing footfall and the pace of development, among other pressures, was equally divisive.

Other topics touched upon in more than one reply were air quality (3); management and maintenance of public spaces (4); and better re-cycling facilities (2).

## **2 Formal submissions**

Aside from the public consultation, statutory consultees and other local organisations were:

Guy's and St Thomas' Foundation Trust  
Guy's and St Thomas' Charity  
Coin Street Community Builders  
National Grid  
Braeburn Estates  
Greater London Authority  
Transport for London  
LCR  
ITV Plc  
Jubilee Gardens Trust  
The Civil Coal Authority  
The Homes and Communities Agency  
Level (1) SE1 Limited  
Network Rail Infrastructure Ltd  
Port of London Authority  
Thames Water  
WeAreWaterloo BID  
Metropolitan Police  
Historic England  
Natural England  
Environment Agency  
UK Power Networks  
BFI  
South Bank Employers' Group and South Bank Business Improvement District  
London Borough of Southwark – officers, ward councillors and relevant cabinet member  
London Borough of Lambeth - officers, ward councillors and relevant cabinet member  
St John’s Church  
Waterloo Action Centre  
Kate Hoey MP for Vauxhall  
Neil Coyle MP for Bermondsey and Old Southwark  
Blackfriars Settlement  
Oasis UK  
Bankside Open Spaces Trust  
Lambeth NHS CCG  
NHS Property Services

South London Maudsley NHS Trust  
NHS Healthy Urban Development Unit  
Maritime Management Organisation  
Highways England  
Office for Rail and Road  
Thames Water  
Ministry of Defence  
London Fire Brigade  
BT  
DCLG  
Npower  
Three  
Eon  
EDF Energy  
EE  
SGN  
SES Waterloo  
City of Westminster  
Wandsworth Council  
Bromley Council  
City of London  
Croydon Council  
Merton Council  
London Heliport  
Social Integration Commission  
Community Health Partnerships  
Health and Safety Executive  
London Ambulance  
NATS

**The main themes identified from the consultation bodies are:**

- (a) Concerns about the practicality of requiring green roofs, and where this is not possible how commuted sums to fit green roofs elsewhere will work;  
  
SoWN response: Policy subsequently clarified. See clarifications, P25
- (b) More information is required on how the "claw back" mechanism would work and which policies it would apply to – community improvements, affordable housing, etc;  
  
SoWN response: Policy subsequently clarified. See clarifications, P25
- (c) Suggest that the affordable housing for particular groups is not consistent with local plan policies;  
  
SoWN response: Noted but no change made. Forum is of the view that developers should understand particular requirement in South Bank and Waterloo and seek to provide where possible.
- (d) Suggest policies are introduced to target air quality;  
  
SoWN response: Additions made to plan linking Transport and Air Quality issues, and new policies added following meetings with stakeholders. See clarifications p25

- (e) Suggest "blanket" policies such as support for offices, open space and affordable housing are considered on a site by site basis;

SoWN response: Noted and changes made to emphasise need to consider on a site by site basis.

- (f) There are conflicting views on whether contributions from new developments and CIL should either be used as revenue funding for maintenance of existing open spaces, or whether they should be used for capital projects, and whether contributions for maintenance of existing infrastructure is compatible with CIL and s106;

Sown response: clarifications made – see p25

- (g) Suggestion that there are modifications and clarifications of the projects included for the defrayal of neighbourhood CIL;

SoWN response: neighbourhood plan is clear that the projects list is a living document which represents a snapshot of the existing needs of the community. This will be updated over time but continues to form a clear set of recommendations to the local authorities on the desired targets for CIL defrayal.

- (h) Suggest more prominence is given to business occupiers;

SoWN response: Noted but no change made.

- (i) Queries on the development review panel – Southwark suggest that it is impractical as they cannot compel developers to do particular things before an application is submitted, and others that this is deal with as part of the PPA process;

SoWN response: Noted but no change made. The development review panel is suggested as best practice, since it would standardise the interface between local people and major developments. This guidance attempts to address concerns among local businesses and residents that the standard of pre-planning consultation is inconsistent, regardless of the existence of any PPA process.

- (j) Suggest hotel policy is moderated – not compatible with current Southwark policy, and community benefits provided by many hotels;

SoWN response: clarifications made. See clarifications P25

- (k) Some additional plans and diagrams are suggested; and

SoWN response: noted and added

- (l) A range of clarification amendments are suggested.

SoWN response: noted and added where appropriate.



### 3 Representations from consultation bodies

Consultation body	Summary of key issues/concerns	How the issues have been addressed
<p>Guy's and St Thomas' NHS Foundation Trust</p>	<p>Green infrastructure, open space and air quality – concern that the open space and tree retention policies may limit the expansion of hospital services. Hospital roofs are not accessible for safety reasons.</p> <p>Supports affordable housing and age friendly housing, emphasises new homes should have adequate health infrastructure.</p> <p>Support policy P15 (greenways) in principle. Require bus stops close to the hospital for patient access.</p> <p>Require further information on a claw back mechanism for community improvements.</p>	<p>Recommend exemption for public buildings / estates and charities</p> <p>Noted.</p> <p>Noted.</p> <p>Could be considered on a case by case basis. See clarifications section p25.</p>
<p>Guy's and St Thomas' Charity</p>	<p>Require that open space policies are limited to public open space.</p> <p>Policies relating to affordable housing, retail and workspace and temporary use of development sites should be applied on a case by case basis.</p> <p>Oppose clawback on the basis it is inconsistent with the local plan or draft development viability SPD.</p> <p>Green roofs should not be accessible, and ground floor space to be publically accessible only where appropriate.</p> <p>Affordable housing for specific groups is contrary to Lambeth Local Plan and London Plan, and providing land elsewhere for affordable housing is too onerous.</p> <p>Requests the Charity's land is listed together in paragraph 5, and be referred to consistently.</p>	<p>Recommend amending to <u>publicly accessible</u> open space.</p> <p>Recommend exemption for public buildings / estates and charities on affordable housing, retail and workspace.</p> <p>Clawback would be for councils to introduce where it is deemed appropriate. Guidance rather than policy</p> <p>See clarifications p25. Policy requires only for majority of ground floor to be publicly accessible.</p> <p>Noted. Recommend change made.</p>

	<p>Requests a policy noting the importance of the hospital.</p> <p>States the ongoing maintenance contribution requirement is not compatible with CIL and S106.</p>	<p>Noted. Recommend no change. Not policy matter.</p> <p>Noted. Other contributors relay the opposite opinion – see clarifications</p>
Coin Street Community Builders	<p>Would like more action on air quality – medium term ban on diesel vehicles and action to reduce vehicle numbers.</p> <p>Would like policy to manage and maintain parks, such as an endowment fund.</p> <p>Delete policy P5iii and amend policy P5ii to clarify that this relates to local older people.</p> <p>Policy P8 supporting text – amend "land values" to "sales values".</p> <p>Reconsider blanket support for offices throughout the area.</p> <p>Range of clarification suggestions.</p>	<p>Planning policy cannot ban vehicles from streets, but new policies added – see clarifications.</p> <p>See clarifications on CIL</p> <p>Noted. Recommend change made.</p> <p>Noted. Recommend change made.</p> <p>Noted. Recommend change made to identify areas in which offices are supported</p> <p>Noted</p>
National Grid	<p>No high voltage/high pressure apparatus in the NP area. Would like to be kept informed.</p>	<p>Noted.</p>
Braeburn Estates	<p>Suggests targets/indicators for monitoring be included.</p> <p>Queries reasoning for green space policies exceeding Lambeth standards.</p> <p>Suggests accessible green roofs may be impractical, and requires further information on commuted sums for retrofitting.</p>	<p>Consider whether appropriate.</p> <p>Noted - To reflect the importance of green spaces to the area, the NP builds on the protections within the Local Plan.</p> <p>Further consideration of green roofs / retrofitting policy in clarifications.</p> <p>Noted. Respondents reflect need for local affordable housing where possible.</p>

	<p>Offsite affordable housing considered impractical, suggest existing Lambeth policy is followed.</p> <p>Clawback already provided for affordable housing, more information required on development review panel and impact review clause.</p> <p>P11 goes further than LP policy ED3 and is unnecessary.</p> <p>Suggest a key is added to the plan at Appendix 10, and LBL allocation routes should take precedence.</p>	<p>Noted.</p> <p>Noted.</p> <p>Consider adding a key.</p>
Greater London Authority	<p>Requests the NP refer to the whole of the area being within the CAZ and the Waterloo Opportunity Area as part of setting the scene, making it clear there is likely to be substantial development.</p> <p>Recommends TfL guidance is referred to in P15, and cycle hire is referred to as a means of transport.</p> <p>Suggests the major TfL road schemes in the area are referred to. Suggests further discussion with the borough and NDF on allocation of the neighbourhood CIL element for transport schemes.</p>	<p>Noted, recommend change made.</p> <p>Noted. Recommend change made</p> <p>Already referred to in 2d.</p>
Transport for London (landowner capacity)	<p>Suggests affordable housing policy is aligned with the Mayor's SPG.</p> <p>Bakerloo line sidings at page 42 do not fall within the NP area.</p> <p>Several TfL sites within the NP area identified for potential development.</p>	<p>Noted.</p> <p>Noted. Recommend removal.</p> <p>Noted.</p>
LCR	<p>Object to policy 14 and suggest it and its supporting text is amended to refer to the railway arches adjoining the Leake Street tunnel rather than the much broader "Waterloo undercrofts", which includes operation space under the station,</p> <p>Suggests that A1, A3 and A4 uses are supported as well as D2, as those uses would also be compatible with the ethos,</p>	<p>Noted. Recommend amendment.</p> <p>Noted. Recommend change made, referring to adjoining areas rather than tunnel itself</p>

	<p>and restaurants are already referred to on page 10 of the plan.</p> <p>Amended wording is suggested.</p>	Noted
ITV Plc	<p>Supports green space replacement.</p> <p>P3- suggests the requirement that new buildings "must" have green roofs is replaced with an obligation that they have regard to providing green roofs, as they are not appropriate in all locations.</p> <p>P2 for new development to improve existing public space - note that Lambeth's CIL reg 123 list includes improvements and maintenance of existing public space which should be taken into account.</p> <p>Suggest affordable housing requirements are assessed on a site by site basis, with potential for AH to be maximised in other parts of the borough. Suggest policies are flexible to cater for evolving London-wide and Lambeth policies.</p> <p>Para 8.3(2) Suggests a development review panel is not necessary as this is included in the PPA process.</p> <p>ITV is supportive of retail and office proposals, and streetscape improvements. Suggests justification and rationale for greenways is included.</p> <p>P16 – suggests that large developments will often be obliged to provide wayfinding via s106.</p> <p>Welcomes CIL being spent within the NP area, noting that this is a Council rather than developer decision.</p>	<p>Noted</p> <p>Wording reflects strength of conviction locally – where demonstrably not possible, developers can contribute to greening of local roofs instead.</p> <p>Noted</p> <p>Support for affordable housing to be brought forward locally rather than in other parts of Boroughs.</p> <p>This guidance responds to consultation responses, where local people want a greater say than currently. Further guidance included in plan's appendices.</p> <p>Noted. Rationale is already included (to encourage people to use less polluted alternative routes).</p> <p>Noted- the NP recognises the importance of the system and by incorporating it in the NP seeks for it to become the adopted standard.</p> <p>Noted.</p>

<p>Jubilee Gardens Trust</p>	<p>P2 – suggest this policy is amended to refer first to management and maintenance of existing public spaces, and then to improvements if there is sufficient funding to maintain them.</p> <p>P17 – fully supports this policy.</p> <p>P18 – would support if the list in section 9 reflected needs. Jubilee Gardens alone needs significant additional revenue funding. Suggest reference to s106 revenue funding and a CIL funded endowment to manage open spaces.</p> <p>Suggest local bodies be used to disburse CIL for open space and not just social infrastructure.</p>	<p>See clarifications.</p> <p>Noted.</p> <p>Noted. Include improvements to green spaces on project list</p> <p>Noted – this is the policy intention so consider amendments where not clear</p>
<p>Level (1) SE1 Limited (owners of development site at 79-87 Westminster Bridge Road and 2&amp;4 Newham Terrace</p>	<p>Suggest NP includes means of providing 1,500 homes and 15,000 jobs to 2026.</p> <p>Suggests the development site is included as a strategic allocation for a mixed-use development. At the minimum, suggests that the development potential to secure NP benefits is referred to.</p>	<p>Noted, Recommend no change</p> <p>Neighbourhood forums are unable to allocate strategic sites. The SOWN plan has not allocated non-strategic sites.</p>
<p>Metropolitan Police</p>	<p>Suggest that P3 amenity space for exclusive use of occupants is a potential risk.</p> <p>Suggest that Secured by Design measures are incorporated for homes, shops and hotels. Officers can advise on creating safe transport links.</p>	<p>Noted. Such space is common feature of development.</p> <p>Secured by design principles are set out in the Borough’s planning documents – the neighbourhood plan is in conformity with these principles</p>
<p>Historic England 18 October 2016</p>	<p>Notes the plan identified heritage and character as key issues, but limited analysis and no policies are included to address them or the major cultural institutions based in the area.</p>	<p>The NP does not include detailed consideration of heritage issues and Historic England has offered to support the development of policies in this area.</p>

13 January 2017	Historic England would welcome the opportunity to include heritage elements.	Steering group to determine whether there is sufficient capacity to address.
Environment Agency 19 December 2016  18 January 2017	<p>Suggests the NP aligns with the Environment Agency Thames Estuary Plan 2100, including policies:</p> <ul style="list-style-type: none"> <li>• setting back development from the river edge to enable upgrading of river walls and embankments;</li> <li>• requiring flood risk assessment; and</li> <li>• manage and mitigate surface water flooding</li> </ul> <p>Agrees with the initial screening assessment that a full Strategic Environmental Assessment is not required.</p>	<p>Issues raised by EA are adequately covered by Local and London Plans</p> <p>Noted.</p>
BFI	<p>Policy P2 should require additional public space "where feasible".</p> <p>Policy P3 should require green roofs "where feasible".</p> <p>Suggest Appendix 3 be amended so it does not prejudice the delivery of projects benefitting the public in the longer terms, and to clarify the area on which a charge will be levied.</p> <p>BFI supports temporary outdoor cultural activities, but argues that policy should be flexibly worded to generate revenue, noting it may not always be justified in planning terms to contribute to the public realm or other public benefits.</p>	<p>Noted. Recommend change made</p> <p>Noted. Developers can deviate from policy where demonstrably not feasible</p> <p>Appendix 3 is a summary of consultation outcomes.</p> <p>This is guidance rather than policy, and therefore discretionary. It is recognised that the funding models of some public bodies require that such revenue generating activity supports core functions – this should be considered 'public benefit'</p>
Transport for London	<p>TfL supports P15 and P16.</p> <p>TfL is keen to understand the aspirations for the rationalisation of bus stops as these are being reviewed.</p> <p>TfL recommends a plan showing existing cycle routes and proposed greenways is</p>	<p>Noted.</p> <p>Specific issues can be raised under separate cover.</p> <p>Noted. Cycle routes are set out elsewhere. Reference</p>

	<p>included. Suggest plan may wish to refer to cycle hire when considering the demands of new developments.</p> <p>Suggests TfL work with the forum to address taxi issues.</p> <p>Suggests forum works with TfL on the Waterloo City Hub project to improve the IMAX roundabout, and suggests it is referred to in the plan. TfL will continue to work with the forum on Waterloo Station.</p> <p>Suggests further discussion on spending the neighbourhood element of CIL on transport infrastructure.</p>	<p>to cycle hire in area not necessary as there is already adequate coverage.</p> <p>Welcomed.</p> <p>Noted.</p> <p>Noted.</p>
<p>South Bank Employers' Group and South Bank Business Improvement District</p>	<p>Noting policies are the result of extensive community engagement, suggest there is support for other work-related developments – for example, the provision of affordable retail units could have a negative impact on some operators, and many hotels do benefit the local community. Suggest there is a risk of unintended consequences, for example as a result of the blanket support for offices.</p> <p>Suggest Policy 17 include detail of the mechanisms available i.e. an endowment fund. Suggest P17 is cross referenced with P1, P2, P3 and P4, showing how mechanisms can deliver those policies</p> <p>P18 – suggests more detail on projects could be included, for example the Spine Route on Belvedere Road and Upper Ground, Jubilee Gardens, and Bernie Spain Gardens.</p> <p>Suggest "community" is defined in relation to defrayal of CIL – will BIDs, SBEG, South Bank Partnership be included?</p> <p>Suggest references to a "clawback" policy are clarified – which policies will these apply to?</p> <p>Support P14.</p>	<p>Noted. The plan is not prescriptive about the need for developments to provide affordable retail, only supportive of attempts to do so. Hotels and office policies now reviewed and amended.</p> <p>Noted, See clarification section on p25.</p> <p>Noted. Recommend addition of specific reference to these projects.</p> <p>Noted. Recommendation to add further detail on P16</p> <p>See clarification section p25</p> <p>Noted.</p> <p>Noted. Plan is scrutinised by GLA.</p>

	<p>Suggest NP refer to any relevant recommendations of the Deputy Mayor for Culture and Creative Industries.</p> <p>Suggest more policies are included on air quality. Suggest clearer language be used.</p> <p>Support P15 and P16.</p>	<p>See clarifications section P 25. Plan to be amended</p> <p>Noted.</p>
London Borough of Southwark	<p>Concern regarding the lack of evidence base.</p> <p>Suggest more prominence be given to businesses.</p> <p>Include statement that supplementary guidance in the NP will not always be used in planning decisions.</p>	<p>Noted.</p> <p>Noted. Pre-submission consultation includes detailed comments from businesses</p> <p>Noted. Recommend no change</p>
	<p>P1 considers that Southwark's policies are sufficient to meet the NP's aims. Designating any further areas would contradict Southwark's evidence.</p> <p>P2 suggest policy details how development can contribute to improvement of open spaces.</p> <p>P3(a) and (b) query "significant proportion" which should be green roofs, and whether the policy would meet NPPF requirement that planning obligations do not make development unviable, are necessary to make the development acceptable, are directly related to the development and are reasonably related in scale and kind. Suggest last bullet point of rationale for 3a is included in (a) – it is not clear how this works. Suggest map is included showing roofs which could be greened.</p> <p>P3(c) insufficient reasons to strictly require amenity space for non-residential buildings. Suggest flexibility to apply private amenity standards over public open space requirements. Rationale refers only to residential buildings.</p>	<p>Noted.</p> <p>Extensive examples of best practice are given in Appendix 9.</p> <p>Not supported. There is no reason to assume the requirement of green roofs would make developments unviable.</p> <p>Map showing which roofs can be greened is in the South Bank and Waterloo Green Infrastructure Audit – will include link.</p> <p>Recommend to include rationale for the provision of amenity space for non-residential buildings including any statistics on use of green space by office workers</p>



	<p>P3(d) does not add to existing policy</p> <p>P3(e) "having regard" to guidance for developers is weak</p> <p>P3(f) suggest clarification – focus on air quality and acoustic design, show it would not threaten viability and would meet planning obligation tests. Clarify "public open space" using each borough's defined terms.</p> <p>P3(f) suggest illustrative example is used.</p> <p>P3(g) Suggests proposals seek to retain trees in the first instance before mitigating loss, and replace trees before providing alternative green infrastructure.</p> <p>P4 suggest non-community uses are also referred to, and supporting text reflects that this is encouraged rather than required.</p> <p>Suggest evidence of loss of open space is provided. Clarify if any open space to be protected is in Southwark.</p> <p>P5 – recommends policy withdrawn as it repeats elements of policy, and introduces restrictions on affordable homes which undermine Local Plan policies.</p> <p>P6 – unnecessary as re-states London Plan and Local Plan policies. Suggest reference to affordable rents in the rationale is clarified to also refer to social rent.</p> <p>P7 – require that offsite affordable housing is provided in the same borough as market housing, not just within the NP area. In the evidence base (appendix 2) give evidence for affordable housing not being affordable</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. Recommend clarification of definition of open space in glossary.</p> <p>Noted. Planning committee would have discretion to impose planning conditions where possible impact is identified.</p> <p>Recommend clarification to reflect this policy intention.</p> <p>Noted. Recommend change made.</p> <p>Recommend evidence is provided for loss of open space.</p> <p>Noted. The policy intention is to introduce an area specific requirement rather than a Borough-wide one. This does not undermine Southwark Plan policies.</p> <p>Noted. No change recommended.</p> <p>There is no requirement that affordable housing must be delivered in the same borough as the development. Evidence on affordability included and</p>
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	<p>or delete this statement, give evidence that homes are not lived in or delete.</p> <p>Page 79 reference 8 – request the relevant document is included.</p> <p>Page 78 amend "policy approaches below" to "policy approaches in section 8.2".</p> <p>P8 conflicts with current Local Plan which allows offices to be replaced with hotels as a town centre use. No evidence provided for the requirement for this policy in Southwark. Suggest policy is checked against draft Southwark policy DM33 for conformity.</p> <p>Pre-application review panel cannot be implemented, as Council cannot require actions before a planning application is submitted. Panel review of discharge of planning conditions is not consistent with guidance and impact review clause is not consistent with NPPF, CIL regs or guidance.</p> <p>Suggest examples are added for the key issues in section 8.3.</p> <p>Update page 80 subheading and first sentence of last paragraph to reflect change in order of sections. Supports inclusion of evidence.</p> <p>P9 suggest map showing strategic cultural area, CAZ, opportunity areas and town centres are included. Suggest RIBA Category B may not be suitable for all units, and clarify if it just applies to small units. Explain RIBA Category B and/or include requirements in list. Suggest Southwark's Employment Land Review and Retail Study are considered.</p> <p>P10 – evidence should be provided that 70% A1 and A3 uses can be supported, and why the two buildings have been excepted. The Cut should be referred to a "protected</p>	<p>empty homes will be provided.</p> <p>Recommend change made.</p> <p>Recommend change made.</p> <p>See clarification section p25</p> <p>Developers would be encouraged rather than required to send plans through pre-application review process.</p> <p>Recommend amendments to this section based on evidence</p> <p>Recommend change made.</p> <p>Noted. Map is featured in other similar documents. Will reference Southwark's Employment Land Review and Retail Study.</p> <p>Noted and amended</p>
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	<p>shopping frontage" rather than "shopping parade".</p> <p>P11 – broadly supportive, suggested evidence of demand included. Part of the policy which does not support loss of office space larger than 1000m<sup>2</sup> is too restrictive, and could lead to planning blight.</p> <p>P12 – Lower Marsh is in Lambeth. CIL cannot subsidise businesses. Suggest p83 reference 15 is checked.</p> <p>P13 – identified social infrastructure buildings are in Lambeth. Guidance point 1, suggest is amended to reflect the wishes of the community rather than where the money will be spent. Guidance point 2 conflicts with Southwark CIL policy to spend CIL on capital projects rather than revenue. Guidance point 10 no tax can be applied to pop up shops etc, so this should be revised.</p> <p>P14 – Waterloo station undercrofts are in Lambeth.</p> <p>P15 – suggest a key is included on the map. Design guidance goes beyond neighbourhood planning. Suggest meeting to discuss what is possible. Sub-point (b) does not add to existing policy.</p> <p>P16 – consider adding replacing existing Legible London signage. Check guidance point 5. Reject statement that streets are not adequately maintained.</p> <p>P17 – policy does not consider relationship between S106 and CIL – s106 to mitigate a development's impact in the immediate vicinity. This policy is not supported.</p> <p>P18 – this policy does not reflect the Council's established process for neighbourhood CIL. Forum is welcome to suggest projects but these will not take precedent over other suggestions. Southwark spends NCIL on capital projects, not revenue. On the guidance,</p>	<p>Recommend removal of loss of large office space policy.</p> <p>Noted. Neighbourhood area includes section of Lambeth.</p> <p>Noted. Recommend no change. Remove guidance point 10.</p> <p>Neighbourhood area includes section of Lambeth.</p> <p>Noted. Recommend no change.</p> <p>Noted. Recommend change to include replacement of defunct LL signage. See clarifications section p25</p> <p>Noted.</p> <p>Noted.</p>
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	<p>representations on s106 can be submitted as a representation on the planning application.</p> <p>The Projects List needs to be more detailed to be included on Southwark's list, and does not consider revenue consuming projects are appropriate.</p> <p>Does not consider SoWN is appropriate as the lead body to liaise with on spending neighbourhood CIL, and suggests that engagement continue in accordance with existing engagement procedures. Comments will be considered alongside all others received. On this basis Southwark will not sign the MoU.</p>	<p>Noted – seek further clarification from Southwark on degree of detail needed</p> <p>Noted.</p>
<p>Southbank Centre</p>	<p>Summary of open space policy Requires developers to replace open space with "better quality and bigger open space" than is lost as a result of development. Given the broad definition of open space, this could be an issue for us and BFI and possible NT in the future. See further below. The 'and bigger' text should be removed as this is inconsistent with policy description later in the plan. If retained it will not be consistent with Lambeth's Local Plan</p> <p>Summary of open space policy Developers should make their development sites available to local people for temporary uses. This could apply in relation to our paces if they are not in active use. For example, parts of our QEH or IMAX Undercrofts which are currently used for essential storage. Is this the intent?</p> <p>Summary of development management policy Proposal that Councils should include a clawback mechanism on large developments, allowing them to claim funds for community improvements if the development was originally undervalued. Although not relevant to us it would primarily be applicable to residential developments. Will be of significant concern to commercial developers and may disincentivise</p>	<p>Policy wording will be changed to reflect as a result of advice from barrister.</p> <p>Policy only applies to sites subject to planning applications, in the period between consent and delivery, and only where both viable and supported by the developer</p> <p>Intention is to apply only where applications are not planning policy compliant. See clarifications.</p>

	<p>development and therefore CIL funding that will arise from it.</p> <p>Summary of retail policy Big developments should provide a certain number of affordable retail units. This would be applicable to future A1/A3 developments at Southbank Centre and proposed BFI Film Centre. It may operate to reduce the revenue generated by these uses, because the range of tenants will be restricted. This would result in less income to support the arts and/or site maintenance or to support a commercial loans to improve the cultural infrastructure. If this policy is to be retained it should explicitly state that it does not apply to cultural development or associated works for the benefit of cultural provision.</p> <p>Policy P3: para c All major proposals must include amenity space "for the exclusive use of tenants and residents". It is not clear how this is intended to apply to non-residential developments. It should be clarified.</p> <p>Para e Paragraph e requires proposals to have regard to 'Guidance for Developers' Appendix 3. This is not included. How prescriptive is the guidance? It should say Appendix 9.</p> <p>Policy P3: para f Loss of amenity during construction phases should be mitigated through financial compensation – see further below.</p> <p>Policy P4 Vacant development sites with planning consent should be utilised for temporary community activity. Potentially applicable to any of our spaces not in active use. Is this the intent?</p>	<p>Recommend exempting public bodies and charities but suggest all developers consider making a proportion of retail units affordable to support businesses.</p> <p>Policy intention is that to reduce burden on existing open space, where offices and residences intensify the population they should include amenity space for exclusive use. Would apply to office element of any Southbank Centre development.</p> <p>Noted and amended</p> <p>See previous comments on clawback. Not applicable to sites outside planning system.</p>
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	<p>Rationale for Policy P3 Should construction work be predicted to have an impact severe enough to prevent the reasonable enjoyment of any publicly accessible open space, the developer will 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". This could potentially be applied to our Festival Wing and BFI film developments and would be an additional financial burden on both organisations. This policy should be amended so that projects to improve public facilities or open space are excluded.</p> <p>Impact review clauses Where there is a possibility that development may result in "unforeseen negative impacts", the planning authority should include an "impact review clause" in consents to obtain further section 106 contributions from the developer after 2 years where a review shows that negative impacts have arisen from the development. We think this would quite possibly be unlawful and would certainly make the development unworkable. This proposal should be removed.</p> <p>Policy P9 Retail development will be encouraged which included a range of unit sizes including units with shop floors under 5 sq m. This is part of a range of policies designed to encourage young businesses and pop-ups. The suggestion that units should be let at 6 month affordable rents if not let within 3 months is onerous and could be counter-productive as it would not encourage landlords to spend time to get the right tenants. We and BFI would need to assess the impact that these requirements would have on the income generated by retail developments for the same reasons in 26 above. Ideally, the policy should exclude developments where the income generated by the development will be used for the public benefit (including arts and culture).</p> <p>Policy P14 Refers to the contribution to the artistic and cultural distinctiveness of the area made by</p>	<p>Noted. Recommended no change.</p> <p>Noted, recommend amendment.</p> <p>Noted. Recommend amendment.</p>
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	<p>the Waterloo undercrofts. We think this is a mistake and should be amended to refer to the Waterloo Station undercrofts instead.</p> <p>Rationale for Policy P14 States that ACV status will be a material consideration given significant weight by the Planning Committee. This is legally incorrect. The amount of weight to be afforded to ACV status is a matter for the planning committee on a case by case basis and cannot be dictated in a neighbourhood plan. But no harm the neighbourhood plan stating that the Committee should</p> <p>Social Infrastructure and Culture: Other Guidance: para 4 States that consideration should be given to the balance between the economic benefits of tourism and the impacts in the resident and business community of increased footfall, noise and disruption to quality of life / business as usual. Likely to apply to future development by us and the BFI. What is the intent?.</p> <p>Social Infrastructure and Culture: Other Guidance: para 5 Suggests a Neighbourhood Development Order to support the temporary development of cultural or public art installations. This is very helpful and is something we and BFI and NT proposed to Lambeth (and drafted) several years ago! This may be a more successful route.</p> <p>Social Infrastructure and Culture: Other Guidance: para 9 Temporary outdoor cultural activity which generates revenue should contribute to the maintenance of the public realm in the area immediately around the site. It is not clear how this will be applied to us or BFI but it would be preferable to avoid revenue being ring fenced. Again where income generated will be used for public benefit they should be excluded. See also Policy P17 immediately below.</p> <p>Policy P17</p>	<p>Noted. Recommend amendment.</p> <p>Noted. Rationale does not state that ACV status is material consideration.</p> <p>Intent is as written. Planning Authority should give consideration to the appropriate balance between these factors.</p> <p>Noted.</p> <p>Noted. Potential for Southbank Centre and BFI to use existing mechanism such as Visitor Management Group to provide a contribution to maintenance arising from increased activity in the public realm.</p>
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	<p>Where development creates an ongoing and significant cost implication for the management and maintenance of the neighbourhood area outside the development's demise, revenue funding to mitigate the impacts should be secured from the development. This requirement would completely undermine our current business model where commercial income cross subsidises the free arts programme and site maintenance costs. Again cultural ones should be excluded.</p> <p>Map of community facilities There should be a key that accompanies the map naming each facility / use</p> <p>Key places to improve: para (i) Suggestion that a proportion of the IMAX advertising revenue might be given over to local improvements would undermine the BFI business model</p> <p>Appendices It would be helpful to have sight of these to assess how prescriptive the guidance is.</p>	<p>Draws inspiration from successful London Eye revenue section 106 mechanism. Should be discussed further at public debate.</p> <p>Noted, recommend inclusion</p> <p>Noted.</p> <p>Noted – available online.</p>
<p>London Borough of Lambeth</p>	<p>Policy P3(a) on provision of a significant proportion of publicly accessible green roof does not allow for feasibility or appropriateness to the character of the development</p> <p>Equally provision of majority of ground floor space as publicly accessible may not always be feasible.</p> <p>Further detail in needed to clarify how P3(f) compensation system for temporary loss of amenity space will work in practice.</p> <p>LBL does not support P3 G(g)ii – compensation for loss of trees - where an unintended consequence may be that trees are lost in exchange for their monetary value.</p> <p>Suggested rewording of rationale (and policy) supporting the creation of publicly accessible green roofs to encourage a range of alternatives.</p>	<p>Noted. See amendments.</p> <p>Noted. See amendments</p> <p>Noted, see amendment</p> <p>Noted, guidance reflects priority that trees should be retained as first priority</p> <p>Recommend amendment to include range of other approaches if P3 a) and b) cannot be met.</p>



	<p>Housing – restrictive housing policy aimed at target groups would undermine Mayoral and Borough wide policy to bring forward housing for a range of groups based on housing need. Evidence suggests North Lambeth is already well provided for for older people’s housing.</p> <p>Only London-wide housing policy is appropriate to address problems of employees in certain industries being unable to afford to live close to work.</p> <p>Above comments apply equally to Policy P6 which seeks to restrict tenure / housing type for unevidenced local requirement. Policy intention for housing which meets minimum space standards is unclear and undermines Lambeth policy.</p> <p>Policy P8 (hotels) does not support general strategic support for hotels in the Central Activities Zone, which includes Waterloo. Lambeth policy allows for loss of office to hotel uses so P8 is in conflict with Lambeth’s policy in this regard.</p> <p>Additional concerns regarding ‘clawback’ mechanism, which is not consistent with CIL regulations, and both pre and post consultation requirements set out in plan guidance.</p> <p>Retail – Policy P9 to make clear that affordable / temporary retail should be supported only in appropriate locations</p> <p>P10(c) – it is not clear what is meant by ‘intensification above shops’ – needs clarification</p> <p>Lambeth supports retaining a minimum A1 use rather than minimum A1 and A3 to prevent the risk that the streets become more evening than daytime uses.</p> <p>P11 – loss of offices of 1000m<sup>2</sup> or over will not be supported conflicts with strategic policy ED3, which sets out the circumstances under which loss is acceptable e.g. viability.</p>	<p>Noted. See clarification section</p> <p>Noted but not supported.</p> <p>Noted. See clarification section p4 Policy intention for minimum space standards is set out in guidance on P35</p> <p>See clarification section p25</p> <p>See clarification section p25</p> <p>Noted. Recommend change made</p> <p>Noted, recommend removal</p> <p>Noted. Recommend change to reflect specific mix rather than combined total.</p> <p>Noted. Recommend removal</p>
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	<p>P13 – Protection of buildings in use as social infrastructure. Lambeth policy S1 includes protections and also sets out a series of tests for changes for when such buildings are no longer in use. No justification to exclude the application of these tests in Waterloo</p> <p>P14 – Leake Street – suggest inclusion of other uses such as A3/A4/D1 to support cultural activity in Leake Street</p> <p>P15 – No objections to policies on walking but the NP should reinforce the need for neighbourhood level interventions to promote cycling</p> <p>P17 – revenue generation. Policy does not deal with relationship between S106 and CIL and rationale for charging needs further thought.</p> <p>P18 – neighbourhood element of CIL. Council has set out procedure for defrayal of NCIL and will need to have regard to NP projects list in developing this, while consulting more widely on the project priorities of the community.</p> <p>Projects in the list generally accord with Council’s priorities, but the list does not have statutory weight and therefore this reason the Council will not enter into a Memorandum of Understanding with SoWN to manage the NCIL allocation process.</p>	<p>Noted. Recommend no change.</p> <p>Noted. Recommend amendment to reflect.</p> <p>Noted. Not strongly supported in consultation evidence.</p> <p>See clarification section p 25</p> <p>Noted.</p> <p>Noted.</p>
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#### 4. Clarifications

This section of the consultation report outlines a number of issues raised which required further thought and discussion by SoWN, either to resolve policy conflicts or to examine new evidence. Each issue is considered below and policies are redrafted, deleted or added to reflect the resolution.

##### 1. Green roofs

Respondents to the survey sought further clarification on the green roofs policy, suggesting that such a policy may in various circumstances:

- a) Threaten viability of development
- b) Compromise safety
- c) Be impractical for reasons of design (e.g. the need to locate plant on the roof)

The rationale for the focus on extensive green roofs has been clarified in the plan. It describes the approach taken by the green infrastructure sub group that the focus of the green roofs policy should be on addressing as many issues as possible simultaneously, including:

- The lack of green space in the neighbourhood area
- The potential for new development to put further pressure on existing green space
- The need for more green infrastructure to improve drainage, air quality, habitats and the urban heat island effect.

The policy has been amended to reflect that while roof gardens are the optimal approach, addressing as they do a number of problems at once, less optimal approaches are acceptable where extensive green roofs are not deliverable. The green roofs policy is now in three parts:

### **Revised policy P3**

#### *Green roofs*

- a) Roofs should be flat where possible and a significant proportion of the roof area should comprise an extensive green roof, accessible to the occupants of the building.*
- b) If developers demonstrate that they cannot meet the requirement in P3a they should make efforts to identify suitable flat roofs on existing buildings in the neighbourhood area to retrofit an extensive green roof.*
- 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 photovoltaic cells, mosses and lichen, intensive green roofs and combined heat and power plant.*

## **2. Air quality**

A number of respondents to the survey sought greater focus on air quality, as an increasing body of evidence is indicating the impact (and in the neighbourhood area, the severity) of the issue. The approach taken by the neighbourhood forum accepts that the pollution problem is a systemic one – i.e. much of the particulate and NO<sub>2</sub> generated comes from vehicles passing through the neighbourhood – requiring policy solutions at a London-wide, national or international level.

For that reason, the plan initially focused on reducing exposure to harmful pollution in consultation with King's College London, whose leading air quality unit is based in the neighbourhood area, and which assisted the forum to develop its evidence base to develop the greenways policy. The experiment with King's College confirmed that taking certain routes through the area reduced exposure to air pollution by up to 70%. Thus the forum identified a network of roads that should be redesigned, via Local Authority, TfL and developer investment, to encourage walking as the principal mode of transport. Design guidance reflected in TfL's recently published Healthy Streets for London document and supported by local design guidelines sets out the features which encourage such activity, including stepping new buildings back from the street, the introduction of wide pavements, street trees, resting places and shared surfaces.

However, further consultation has also enabled the plan to emphasise some of the measures that developers can take to mitigate the problem. The greenways policy (currently P15) becomes P5 a, since it principally relates to air quality, and the complete draft policies are below:

## **Revised policy P5**

### *Air Quality*

- a) *Given the high levels of air pollution in the area, development plans must show how they contribute to the improvement of air quality in South Bank and Waterloo. Such measures include, but are not limited to:*
  - a. *Replacement of developments incorporating car parking with car free developments and electric vehicle charging points*
  - b. *Incorporation of air filtration systems to improve indoor air quality for occupants*
  - c. *Implementation of green infrastructure*
  - d. *The use of low-pollution vehicles during construction*
  - e. *Freight consolidation arrangements*
- b) *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:*
  - a. *Create an improved, pedestrian friendly streetscape, encouraging walking as the primary mode, as set out in local<sup>1</sup> and TfL<sup>2</sup> guidance'*
  - b. *Contribute to an improvement in air quality and a reduction in noise levels*
- c) *Development of Waterloo Station will not be supported unless measures are introduced to restrict diesel taxis and diesel freight vehicles serving the Station.*

### *Other guidance*

*Network Rail should take immediate steps to prevent the ongoing harmful effects of diesel vehicles serving Waterloo Station. Such measures should include:*

- a) *Restricting the capacity of taxi ranks*
- b) *Monitoring and enforcing against idling taxis and those breaking existing queuing rules*

## **3. Clawback mechanism and impact review clause**

Developers and local authorities sought further clarification on the use of a 'clawback mechanism' in case where policy requirements such as affordable housing were not able to be delivered to the fullest extent, but subsequent upward revisions to sales values would make policy compliance possible. The mechanism was applied in the case of the Braeburn development of the Shell site.

No changes have been made to policy because the policy is consistent with both boroughs SPDs and practice. Also, as guidance, it is for the Councils' Planning Committees to determine where this mechanism would be most appropriately applied.

A revision to the guidance has been applied to exempt public bodies and charities.

The similar impact review clause (Development Management Guidance point 4) has been removed due to the potential for misinterpretation, and because it would apply to elements delivered through CIL rather than Section 106.

## **4. Affordable housing**

From the responses to the pre-submission consultations (the public) and those from consultation bodies (the corporate partners), there is clearly a divergence in ambition.

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<sup>1</sup> See guidance Appendix 10

<sup>2</sup> Healthy Streets for London, Transport for London, 2016

P5

The public overwhelmingly backed the contention that Waterloo has housing needs which are different to the rest of the borough(s). The proposition that housing policy in Waterloo should recognise these differences was supported: for low to middle income workers (by a margin of 30:1), older people needing to downsize (12:1) and the elderly in need of care (9:1).

The formal respondents, with the notable exception of G&STT NHS Foundation, did not understand why the SoWN area should differ from Mayoral or Borough policy. These representations suggest Policy P5 is either inflexible, repeats or undermines Local Plan policies or is restrictive.

P6

The public similarly backed a policy which encouraged innovative housing models (15:1), whilst the formal respondents felt that this would repeat London Plan policy as well as undermine Lambeth policy.

P7

The proposition that housing can be delivered Community Land Trusts was supported by the public (24:1) but the formal respondents suggested that this was impractical, onerous, should be left to London-wide policy.

The consideration of the SoWN steering group was that the Boroughs and corporate partners did not have the inclination to support policies which addressed the local needs of the Waterloo/ South Bank neighbourhoods. Little imagination had been shown by these bodies, despite the clear backing from the public consultees. The essence of Neighbourhood Plans is that they cater for differences in needs between neighbourhoods within the same boroughs and this is clearly seen in the public responses.

Therefore no revision to policy is made.

## **5. Community Infrastructure Levy and Section 106**

A number of contributors to the consultation raised questions about the plan's explanation of the differences between CIL and Section 106. In addition, Southwark Council did not support the use of CIL for revenue projects. Consequently, Policies P2, P17 and P18 have been amended as shown to reflect the general approach to management and maintenance in the projects list and to make it clear that management and maintenance contributions under this policy would be s106 rather than CIL.

### **Revised policy P2**

*Major developments which contribute to the intensification of the neighbourhood area should contribute to the improvement, and, where there is a direct impact, management and maintenance, of existing open spaces or provide additional publicly accessible open space.*

### **Revised Policy P17**

*Where a development creates a direct impact on the cost of managing and maintaining public realm and open space outside the development's demise, through additional footfall and usage, revenue funding to mitigate the impacts should be secured from the development.*

### **Revised Policy P18**

*The neighbourhood element of CIL generated in the area must be used to fund the projects set out in section 9 of the neighbourhood plan and any other projects as determined by the neighbourhood forum over the life of the plan.*

## 6. Hotels

There was disagreement in both the public and stakeholder consultation processes and in the wider debate around the social and economic impact of hotels. Broadly speaking the perceived negative impacts of hotels, mainly raised by local residents are:

- Loss of other uses, such as residential (or office)
- Proliferation encourages local retailers to change their target demographic, reducing shopping amenities for local residents
- The perception that local residents are not benefited by hotels, or that hotels are not welcoming to locals. That they do not provide 'active' street frontage, or contribute to the life of the high street.
- That their proliferation has disproportionate impact on amenities such as walk in centres, or causes additional burden for public services such as street cleaning etc.
- Design tends to reduce the possibility of green open space
- Taxi and coach pick up and drop off exacerbates local pollution

There is some acceptance that hotels operate in very different ways, with those engaging in best practice bringing a number of positive benefits to the area, including:

- Support for the local retail and food and drink offer
- An addition to the local night time economy, encouraging visitors to the neighbourhood.
- They create large numbers of jobs and aim to recruit locally where possible
- Opening their doors to local people to host meetings and events, provide discounts for gyms, spa facilities and other facilities
- They contribute, through developer contributions, to the cost of renewing the public realm

Hotels such as Citizen M, Park Plaza and Mondrian have been examples of such hotel development in the vicinity.

### Revised policy P8

*The neighbourhood recognises the inevitable demand for hotel developments in the area. Any proposal should satisfy certain conditions to mitigate impact on the existing dynamics of the residential, business and social communities, including:*

- 1 *Provide as much retail frontage as possible to a high street, where the units made available only have high street access.*
- 2 *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.*
- 3 *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.*
- 4 *Developments should continue to engage with local recruitment mechanisms to ensure local candidates are employed wherever possible.*