



## **South Bank and Waterloo Neighbourhood Plan 2017-2032**

### **Updated Basic Conditions Statement (December 2017)**

**Supported by**



The South Bank and Waterloo Neighbourhood Plan is a Neighbourhood Development Plan developed by a range of stakeholders from the resident and business communities within the designated neighbourhood plan area. The plan has passed through a number of rounds of community engagement, during which time contributors helped variously to identify the area, define the constitution of the forum, identify the key issues the plan should focus on, develop policy and refine the plan itself.

Following the pre-submission consultation, organised by the neighbourhood forum, South Bank & Waterloo Neighbours (SoWN), the plan is submitted to the London Boroughs of Lambeth and Southwark, the two local authorities the neighbourhood area covers, along with this Basic Conditions Statement and other supporting documents.

#### **1 General legal requirements**

- 1.1 The draft South Bank and Waterloo Neighbourhood Plan is submitted by SoWN. SoWN was designated as a neighbourhood forum by the London Boroughs of Lambeth and Southwark on 18 April 2014, following an application made on 30 April 2013 under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. South Bank & Waterloo Neighbours is a qualifying body under section 61E of the Town and Country Planning 1990 (as amended).
- 1.2 The neighbourhood area was also applied for on 30 April 2013 and designated on 18 April 2014. The designated neighbourhood area boundary was amended from the area originally

applied for, to exclude the section of Southwark between the borough boundary on Hatfields and Blackfriars Road which was designated as part of the Bankside neighbourhood area earlier in 2014.

- 1.3 The draft neighbourhood plan sets out policies relating to land use and development within the designated neighbourhood area.
- 1.4 The plan will be in force for fifteen years, between 2017 and 2032. This lines up approximately with the Local Development Plans of Lambeth and Southwark Council, which are for the period up to 2030 and 2026 respectively.
- 1.5 The draft neighbourhood plan policies do not relate to excluded development, as defined by section 61K of the Town and Country Planning Act 1990, including amongst other elements County matters and nationally significant infrastructure projects.
- 1.6 The draft neighbourhood plan policies relate only to the designated South Bank and Waterloo neighbourhood plan area and no other neighbourhood areas.

This Basic Conditions Statement sets out the Basic Conditions the South Bank and Waterloo Neighbourhood Plan must conform to and demonstrates compliance with these conditions.

## 2 The Basic Conditions

- 2.1 A Neighbourhood Plan is required to conform to a number of "Basic Conditions" before it may proceed to a community referendum, which are tested at Examination. The Basic Conditions are:
  - a) having regard to **national policies and advice contained in guidance issued by the Secretary of State** it is appropriate to make the order (or neighbourhood plan);
  - b) the making of the order (or neighbourhood plan) contributes to the **achievement of sustainable development**;
  - c) the making of the order (or neighbourhood plan) is in **general conformity with the strategic policies contained in the development plan for the area of the authority** (or any part of that area).
  - d) the making of the order (or neighbourhood plan) **does not breach, and is otherwise compatible with, EU obligations**.
  - e) **prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with** in connection with the proposal for the order (or neighbourhood plan)
- 2.2 The table overleaf provides a summary of each Basic Condition, setting out more information on the requirements of each and forming a judgement on whether this Basic Conditions Statement needs to consider each individual policy of the South Bank and Waterloo Neighbourhood Plan against each Basic Condition. It provides evidence that Basic Conditions D and E as set out in 2.1 are met. These are not considered further.

Basic Condition	Explanation
<p><b>Regard to National Policies and Guidance</b></p>	<p>The Neighbourhood Plan must be in accordance with the National Planning Policy Framework (NPPF) and any relevant information contained within National Planning Practice Guidance (NPPG) and Written Ministerial Statements.</p> <p>This Basic Conditions Statement will also consider the compatibility of each Policy of the South Bank and Waterloo Neighbourhood Plan with relevant national policies and guidance.</p>
<p><b>Contribution to achievement of sustainable development</b></p>	<p>Achieving sustainable development is an important aim of planning policy documents as set out in the NPPF. Sustainable Development is broadly regarded by the NPPF to comprise <i>“meeting the needs of the present without compromising the ability of future generations to meet their own needs”</i> (Page 2). The NPPF continues to set three dimensions to sustainable development: economic, social and environmental. In order to meet these aims, the NPPF calls on planning policy documents to:</p> <ol style="list-style-type: none"> <li>1. <i>Contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</i></li> <li>2. <i>support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and</i></li> <li>3. <i>contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</i></li> </ol> <p>This Basic Conditions Statement considers the compatibility of each Policy of the South Bank and Waterloo Neighbourhood Plan with the principles of sustainable development.</p>

<p><b>General conformity with the strategic policies of the Development Plan</b></p>	<p>The South Bank and Waterloo Neighbourhood Plan Area spans the boundary of the London Borough of Lambeth and the London Borough of Southwark. It is also within the boundaries of Greater London. Therefore, it must be in general conformity with the strategic policies of the following Development Plan Documents:</p> <ol style="list-style-type: none"> <li>1. The London Plan (adopted March 2016 as a Consolidated Version, as amended);</li> <li>2. The Lambeth Local Plan (adopted September 2015);</li> <li>3. The Southwark Core Strategy (adopted April 2011); and</li> <li>4. Saved Southwark Plan Policies (2007).</li> </ol> <p>In accordance with Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20160211), <u>this Basic Conditions Statement does not demonstrate general conformity with the policies of any emerging Development Plan Documents</u>. However, it is noted that the evidence base for emerging Development Plan Documents is important to informing the Neighbourhood Plan and conformity with emerging policies is crucial for the long-term success of the Neighbourhood Plan given that in the event of any future conflict the most recent policy will take precedent.</p> <p>Paragraph 156 defines what is meant by “strategic policies”, which cover the following issues:</p> <ul style="list-style-type: none"> <li>• <i>the homes and jobs needed in the area;</i></li> <li>• <i>the provision of retail, leisure and other commercial development;</i></li> <li>• <i>the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</i></li> <li>• <i>the provision of health, security, community and cultural infrastructure and other local facilities;</i></li> <li>• <i>climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.</i></li> </ul> <p>NPPG defines what relevant parties should be considering when testing for “general conformity” as follows:</p> <ul style="list-style-type: none"> <li>• <i>whether the neighbourhood plan policy or development proposal supports and upholds the</i></li> </ul>
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	<p><i>general principle that the strategic policy is concerned with;</i></p> <ul style="list-style-type: none"> <li>• <i>the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy;</i></li> <li>• <i>whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy;</i></li> <li>• <i>the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach.</i></li> </ul> <p>[Paragraph: 074 Reference ID: 41-074-20140306]</p> <p>This Basic Conditions Statement considers the conformity of each Policy of the South Bank and Waterloo Neighbourhood Plan with the strategic policies of the three Development Plan documents set out above.</p>
<p><b>Compatibility with EU Obligations</b></p>	<p>Neighbourhood Plans must not breach EU Directives relevant to their content. Each relevant Directive is set out below with an explanation of how the SoWN Neighbourhood Plan is compatible with each.</p> <p><i>1. Directive 2001/42/EC – the potential need to prepare a Strategic Environmental Assessment, assessing the environmental impact of policies chosen in the Neighbourhood Plan in the context of alternative options.</i></p> <p>In accordance with protocol, the South Bank and Waterloo Neighbourhood Plan has been screened for the potential need to prepare a SEA by the London Boroughs of Southwark and Lambeth. On 6 December 2016 the Boroughs released an Initial SEA Screening Report, which concluded that the South Bank and Waterloo Neighbourhood Plan would not require an SEA. This view will be confirmed following consultation with Statutory Bodies such as Natural England, Environment Agency and Historic England. This Basic Conditions Statement is prepared with the expectation that a SEA is not required and therefore the Directive is not considered relevant to the South Bank and Waterloo Neighbourhood Plan and could not be breached.</p> <p><i>1. Directive 92/43/EEC – the potential need for a Habitats Regulations Assessment (HRA) to assess the impact of a plan on a European Designated Site (a Special Protection Area,</i></p>

*Special Area of Conservation or RAMSAR Site), in order to protect the conservation of natural habitats of wild fauna and flora; and, Directive 2009/147/EC – the conservation of wild birds.*

There are no European Designated Sites within the boundaries of the South Bank and Waterloo Neighbourhood Plan, nor within its vicinity. This Basic Conditions Statement is prepared with the expectation that a HRA is not required and therefore this Directive is not considered relevant to the South Bank and Waterloo Neighbourhood Plan and could not be breached.

*2. Directive 2008/98/EC – the Waste Framework Directive.*

The South Bank and Waterloo Neighbourhood Plan does not include any policies in relation to the management of waste, nor does the area include a waste management site. On that basis, this Directive is not considered relevant to the South Bank and Waterloo Neighbourhood Plan and therefore could not be breached.

*3. Directive 2008/50/EC – the Air Quality Directive.*

The South Bank and Waterloo Neighbourhood Plan includes some policies relevant to Air Quality. These policies are tested in accordance with national policy and guidance relevant to their content. This Basic Conditions Statement does not consider those policies to Breach the requirements of the Air Quality Directive as they comprise small-scale interventions and do not negate from the framework for measurement and improvement of air quality set in the Directive.

*4. Directive 200/60/EC – the Water Quality Directive.*

The South Bank and Waterloo Neighbourhood Plan does not include any policies related to water quality. Therefore, it does not breach this Directive.

It is not considered that any of the EU Directives set out above are of particular relevance to the South Bank and Waterloo Neighbourhood Plan and, on that basis, these are not considered to be breached and are not discussed further in this Basic Conditions Statement.

Please note that Environmental Impact Assessments are not required in support of Neighbourhood Plans and this Neighbourhood Plan includes no site allocations that could potentially require an EIA.

<b>Meeting Prescribed Conditions</b>	The Prescribed Conditions regard the protection of European sites, including offshore marine sites. This Neighbourhood Plan does not have a significant impact on either of these types of sites as confirmed in the SEA Screening Assessment, which states that Regulations 102 and 102A have been satisfied. Therefore, these are not considered further in this Basic Conditions Statement.
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### 3 Structure of analysis

3.1 In order to provide a clear and concise structure and noting the range of documents to consider against the content of the Neighbourhood Plan, the analysis of compliance with Basic Conditions is set out in the following format. This takes a “policy-by-policy” approach to demonstrating the acceptability of the policies in the South Bank and Waterloo Neighbourhood Plan. This is based on the approach suggested in Planning Aid England’s Guidance Document titled “Approaches to writing a basic condition statement: putting the pieces together” (available at: [http://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/Approaches\\_to\\_writing\\_a\\_basic\\_conditions\\_statement1.pdf](http://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/Approaches_to_writing_a_basic_conditions_statement1.pdf))

<i>Policy number</i>	
<b>Policy wording</b>	<i>Policy text.</i>
<b>National policies and guidance</b>	
<b>NPPF</b>	<i>Identification of relevant paragraphs and explanation of regard taken by the Neighbourhood Plan.</i>
<b>NPPG/ Written Ministerial Statements</b>	<i>Identification of relevant guidance and statements and explanation of regard taken by the Neighbourhood Plan.</i>
<b>Principles of sustainable development</b>	
<b>Economic Social Environmental</b>	<i>Explanation of the contribution made by the policy to sustainable development. For each dimension of sustainable development, each is approximated a colour-coded score out of five for contribution based on an assessment of likely effects:</i>
	<b>-- = Major negative contribution</b>
	<b>- = Minor negative contribution</b>
	<b>o Negligible contribution</b>
	<b>+ Minor positive contribution</b>
	<b>++ Major positive contribution</b>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<i>Identification of London Plan strategic policies relevant to the Neighbourhood Plan policy in question and explanation of general conformity.</i>

<b>Lambeth Local Plan</b>	<i>Identification of Lambeth Local Plan strategic policies relevant to the Neighbourhood Plan policy in question and explanation of general conformity.</i>
<b>Southwark Core Strategy and Saved Southwark Plan Policies</b>	<i>Identification of Southwark Core Strategy and saved Southwark Plan strategic policies relevant to the Neighbourhood Plan policy in question and explanation of general conformity.</i>
<b>Summary</b>	
<i>Does the Policy meet the basic conditions?</i>	

3.3 In addition to policies, the neighbourhood plan incorporates a selection of guidance notes and potential projects. The guidance notes exist to add detail to policies and, as guidance, would not form part of the development plan policies that planning applications would have to be in accordance with. The projects identified are not formal site allocations, instead this is a list of priority projects that could be funded through the use of planning obligation money and grant funding. Therefore any works that require future planning permission would not benefit from the principle of allocation in the neighbourhood plan. In accordance with the nature of the guidance and the projects, this Basic Conditions Statement is satisfied that the guidance and projects meet the basic conditions.

3.4 The following sections analyse the policies under the relevant chapter headings, which are:

- (a) Green Infrastructure, open space and air quality;
- (b) Housing;
- (c) Development management;
- (d) Retail and work;
- (e) Social infrastructure and culture;
- (f) Streetscape and transport; and
- (g) Planning gain and mitigation

## Policy Analysis

### 4 Green Infrastructure, open space and air quality

4.1 This chapter contains Policies 1-6, which are addressed in turn.

<b>Policy 1 (P1)</b>	
<b>Policy wording</b>	Proposals which propose any permanent reduction of existing open space will not be approved, unless:



	<ul style="list-style-type: none"> <li>a. New open space of equivalent quantity is created within the Neighbourhood Plan area which replaces open space lost as a result of that development.</li> <li>b. The quality, amenity value 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.</li> <li>c. In appropriate cases more or better quality open space may be required to compensate for other harm.</li> </ul>
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**National policies and guidance**

**NPPF**

**Relevant paragraphs:**

73, 74

**Explanation:**

Paragraph 73 sets out that access to open space can make an important contribution to the health and well-being of communities and that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. Paragraph 74 sets out that open spaces should be protected unless land is shown to be surplus to requirements, loss would be mitigated by equivalent or better open space or the benefits (for sports and recreation) outweigh the loss.

P1 has regard to the framework set in Paragraphs 73 and 74 as it seeks to prevent the loss of open space for the benefit of the health and wellbeing of people in the SoWN area. Notably, this is except where there is a positive outcome for local space provision as a result of the loss, either through an increased quality or quantity of open space locally (in accordance with Paragraph 74). The 2013 Lambeth Open Space Strategy is a relatively up-to-date assessment of the need for open space and notes a pressure on Open Spaces in the north of the Borough, including in particular Archbishop’s Park. The Southwark Open Space Strategy, also prepared in 2013, also notes a deficiency of open space in the north part of the Borough, including in Bankside, which includes the small part of the Neighbourhood Plan Area in Southwark. Given densification of the Neighbourhood Plan Area has taken place since 2013 and no significant increase in open space, it is considered that this position cannot have improved since 2013. Therefore, there is no possibility of open spaces in the Neighbourhood Plan Area being “surplus to requirements” in a principled sense and where an open space is underused this would be due to poor accessibility/upkeep and therefore it should

	be improved in quality or re-provided elsewhere. It is clear that the policy has been developed with full regard to Paragraphs 73 and 74 of the NPPF.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	<b>Relevant Paragraphs:</b> Paragraph: 001 Reference ID: 37-001-20140306
	<b>Explanation:</b> The Neighbourhood Plan has regard to the statement that it is the role of the local planning authority (i.e. Southwark and Lambeth) to assess the need for open space in their area and therefore bases P1 on the evidence of Southwark and Lambeth Councils (in the respective 2013 Open Space Strategies). Furthermore, P1 is formed with regard to the statement in the PPG extract that open space can have health and recreational benefits to people living and working nearby.
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>When considered in isolation, open spaces may be less economically productive than other uses in terms of jobs or revenue, particularly employment land. However, open spaces are a key draw for visitors, companies and residents and without a sufficient amount of open space the area would be less attractive to these people. The Southwark Open Space Strategy Evidence Base Report in particular references a Report by CABE titled "<i>The Value of Public Space – How high quality parks and public spaces create economic, social and environmental value</i>" states that sufficient and high-quality open space provision has a positive impact on business, rental values, property prices and the ability to create tax revenue. The Lambeth Open Space Strategy does state that "sustainable economic growth relies on services provided by the natural environment". While open spaces are not always "natural" as such, some of the economic benefits, such as for flood risk reduction, also relate to manufactured but green open spaces. In addition, protecting current open spaces does not negatively impact any other current land uses.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>Evidence shows that public open spaces have positive economic sustainability impacts on their localities and therefore this policy can be regarded to as a minimum have a minor positive impact on economic sustainability.</p>
<b>Social</b>	The reference to the aforementioned CABE Report in the Southwark Open Space Strategy evidence base states that various social benefits are brought by the provision of sufficient quantity and high-quality open space (as opposed to insufficient quality or low-quality space), including the impact on physical and mental

	<p>health, benefits for children and young people through play, the reduction of crime or fear of crime and the equality of open spaces (i.e. all users are equally important). The Lambeth Open Space strategy references the role of open spaces in social sustainability, as evidenced by the NEA and the Marmot Review, Fair Society, Healthy Lives. Among other matters, the Open Space Strategy, as an evidence base document, states that green spaces encourage social activity and reduce crime. Therefore, protection of the quality and quantity of open spaces in neighbourhoods is crucial for sustainable social development.</p> <p><b>Contribution to sustainable social development: ++</b></p> <p>Evidence shows that public open spaces have wide-ranging positive social sustainability impacts on their localities and therefore this policy can be regarded to have a major positive impact on social sustainability.</p>
<b>Environmental</b>	<p>Open spaces in the Neighbourhood Plan area include a greater concentration of biodiversity (trees, plants) than other areas, which enable, among other matters, pollution absorption, cooling of air, surface water drainage, as evidenced in the CABE Report. Protection is vital to ensure sustainable environmental development, and the reference to "quality" when considering replacement open spaces gives the respective local planning authorities the ability to ensure that improvement planting and tree provision is a key requirement for replacement open space.</p> <p><b>Contribution to sustainable environmental development: ++</b></p> <p>Evidence shows that public open spaces that include sufficient planting/permeable surfaces have important positive environmental sustainability impacts on their localities and therefore this policy can be regarded to have a major positive impact on environmental sustainability.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 7.18 supports the protection of open spaces unless suitable alternative provision is available in the vicinity. P1 is in general conformity with this policy as it seeks to prevent the loss of open space without re-provision and it upholds its general principles without conflict.</p>
<b>Lambeth Local Plan</b>	<p>Policy EN1(a) supports the protection of open spaces unless replacement open space is of equivalent or better quality, would be beneficial as part of estate regeneration or loss would be for facilities directly related to the use of the open space (such as changing rooms). P1 is in general conformity with this policy as its</p>

	<p>requirements are all included within Policy EN1(a). There is no conflict between the policies. P1 adds some detail to Policy EN1(a) as it expects additional provision where the development that results in a loss of open space increases pressure on the open space. The rationale for this is due to the pressure on open spaces in the Neighbourhood Plan Area (as evidenced in the Lambeth and Southwark Open Space Strategies) and an anticipation of higher density development that may increase pressure on local spaces, as the area is identified as a location where higher density development may be acceptable in the planning policies of the development plan.</p>
<p><b>Southwark Core Strategy and saved Southwark Plan Policies</b></p>	<p>Core Strategy Policy 11 supports the protection of open spaces in the borough from inappropriate development. Saved Southwark Plan Policy 3.27 supports the protection of Other Open Spaces and will only allow loss should various criteria be met. P1 does not compromise the delivery of these policies and there is no conflict with their intentions. As with the Lambeth Local Plan assessment, part (c) of P1 adds a level of detail in stating that more provision may sometimes be required than the space lost, where additional pressure is caused as a result of the new development. The justification for this provision is the same is with Lambeth, namely that the area is already noted as a high pressure area for open space (as set out in the Southwark Open Space strategy) and is also identified as suitable for high density development.</p>
<p><b>Summary</b></p>	
<p><b>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</b></p>	

<p><b>Policy 2 (P2)</b></p>	
<p><b>Policy wording</b></p>	<p>Major developments which contribute to the intensification of the neighbourhood area should contribute to the improvement of existing open spaces or provide additional publicly accessible open space where feasible.</p>
<p><b>National policies and guidance</b></p>	
<p><b>NPPF</b></p>	<p><b>Relevant Paragraphs:</b> 73</p>
	<p>Paragraph 73 sets out that access to open space can make an important contribution to the health and well-being of communities and that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.</p>

	<p>The Policy supports the proportional improvement/increase of open space alongside densification of the SoWN area, thus showing regard to the statement in support of access to open space. The policy recognises that there is a current deficiency of open space in the area and that this will be exacerbated by densification, therefore seeking that this is “offset” with new open spaces, in order to facilitate the continued delivery of the benefits of open space to public health as set out in Paragraph 73.</p>
<p><b>NPPG/ Written Ministerial Statements (where applicable)</b></p>	<p><b>Relevant Paragraphs:</b> Paragraph: 001 Reference ID: 37-001-20140306</p>
	<p><b>Explanation:</b> P2 is formed with regard to the statement that open space can have health and recreational benefits to people living and working nearby as it seeks to ensure any increase in the number of people working, living and visiting the Neighbourhood Plan Area due to a densification of built structures does not have a detrimental impact on the access of open space to existing and new workers, residents and visitors.</p>
<p><b>Principles of sustainable development</b></p>	
<p><b>Economic</b></p>	<p>As with P1, the economic benefits of publicly accessible open space are clearly evidenced as set out in the Lambeth and Southwark Open Space Strategies (and the evidence documents these draw upon, such as the CABE Report).</p> <p>A key element of this policy is the inclusion of the word “feasible”, which allows an applicant to robustly demonstrate to the local planning authority where it may not be feasible to provide public open space. One such example could be where it is not economically viable. Therefore, the policy is worded in such a way that does not impact the delivery of sustainable economic development through setting onerous requirements.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>Evidence shows that public open spaces have positive economic sustainability impacts on their localities and therefore, particularly with the inclusion of a feasibility caveat, this policy can be regarded to as a minimum have a minor positive impact on economic sustainability.</p>
<p><b>Social</b></p>	<p>As with P1, the social benefits of publicly accessible social space are clear, as evidenced in the Lambeth and Southwark Open Space Strategies and the evidence documents referenced in these.</p>

	<p>increasing or improving open space to ensure new residents, workers and visitors arising as a result of major developments have sufficient access to open space.</p> <p><b>Contribution to sustainable social development: ++</b></p> <p>Evidence shows that public open spaces have wide-ranging positive social sustainability impacts on their localities and therefore this policy can be regarded to have a major positive impact on social sustainability.</p>
<b>Environmental</b>	<p>Provided new Open Spaces include a sufficient amount of planting and permeable surfaces (which the relevant local planning authority can ensure when determining planning applications), the environmental benefits of this policy are clear and set out in the assessment of P1. The benefits for environmental sustainability are particularly important in the context of this policy as potential negative environmental impacts of new development, such as heat emission, increase in surface water flood risk and pollution may be “offset” through appropriate open space.</p> <p><b>Contribution to sustainable environmental development: ++</b></p> <p>Evidence shows that public open spaces that include sufficient planting/permeable surfaces have important positive environmental sustainability impacts on their localities and therefore this policy can be regarded to have a major positive impact on environmental sustainability, provided that the relevant local planning authority ensures that planting is sufficient and surfaces are permeable where feasible.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>The policy adds an additional level of detail to Policy 7.18, which does not specifically address the provision of open space alongside new development, however is not in conflict with that Policy nor does it undermine the content of that Policy.</p>
<b>Lambeth Local Plan</b>	<p>Policy EN1(d) supports an increase of open space in the borough, including through requiring major developments in areas of deficiency to provide on-site open space or, if not feasible, provide payment towards off-site improvements. P2 is in general conformity with this policy and does not generally conflict with its ambitions. However, the policy is more flexible than EN1(d) as it supports financial contributions equally to new provision, rather than only in the event that new open spaces cannot be delivered. The rationale for this is that there are a number of open spaces in the Neighbourhood Plan Area that would benefit from some</p>

	improvement, which means that financial contributions could be equally as beneficial as new provision.
<b>Southwark Core Strategy and saved Southwark Plan Policies.</b>	Core Strategy Policy 11 requires new developments to help meet the need of a growing population by providing space for children’s play, gardens and other green areas and increasing access to open spaces particularly in areas of open space deficiency. P2 upholds the general principle of this policy, particularly noting the area has an open space deficiency as set out in the Southwark Open Space Strategy, and strengthens the expectation of Policy 11 by setting out an exact expectation for contributions towards the improvement of existing open spaces.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 3 (P3)</b>	
<b>Policy wording</b>	<p>All major proposals must meet the following criteria:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol>
<b>National policies and guidance</b>	
<b>NPPF</b>	<b>Relevant Paragraphs:</b> 17, 58, 73, 110

	<p>Paragraph 17 sets out a core planning principle to provide a “good standard of amenity” for all future occupants of land and buildings. The final aspect of criteria a) has regard to Paragraph 17 the need to provide sufficient/high quality amenity space.</p> <p>Paragraph 58 supports development that establishes a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. Green Roofs with an element of accessibility to occupiers can provide both an attractive aesthetic value to an area, creating a strong sense of place, and can assist to the ambition to provide comfortable places to live, work and visit through adding to the provision of amenity space in the Neighbourhood Plan Area. The Policy has regard to Paragraph 58.</p> <p>Paragraph 73 sets out the important contribution to health and well-being of communities made by access to high-quality open spaces. The Policy seeks to achieve this through increasing the amount of open space in the Neighbourhood Plan area, albeit limited to occupants and not necessarily ‘public’.</p> <p>Paragraph 110 supports efforts to minimise pollution and other adverse effects of development on the local environments. Green roofs absorb pollutants and reduce the amount of rainwater entering drains. Therefore, this policy has regard to the statement made at Paragraph 110.</p>
<p><b>NPPG/ Written Ministerial Statements (where applicable)</b></p>	<p><b>Relevant Paragraphs:</b></p> <p>Paragraph: 027 Reference ID: 8-027-2160211  Paragraph: 028 Reference ID: 8-028-20160211  Paragraph: 029 Reference ID: 8-029-20160211</p> <p>Paragraph: 027 Reference ID: 8-027-216021 states that green roofs should be considered as “green infrastructure”. The assessment of this policy has regard to this statement.</p> <p>Paragraph: 028 Reference ID: 8-028-20160211 states that green infrastructure is important to the delivery of high quality sustainable development. This policy has regard to the need to ensure green infrastructure is provided alongside development by identifying green roofs as an achievable form of green infrastructure in the context of the densely built neighbourhood plan area (other examples such as parks, open spaces, playing fields, woodlands, allotments, private gardens and water bodies</p>



	<p>and features would be more likely to be infeasible to deliver in the Neighbourhood Plan Area).</p> <p>Paragraph: 029 Reference ID: 8-029-20160211 states that:  <i>“To assist in planning positively for green infrastructure local planning authorities may wish to prepare an authority-wide green infrastructure framework or strategy. This should be evidence-based by, for example, including an assessment of current green infrastructure provision that identifies gaps in the network and the components and opportunities for improvement. The assessment can inform the role of green infrastructure in local and neighbourhood plans, infrastructure delivery plans and Community Infrastructure Levy (CIL) schedules.”</i></p> <p>Taking regard to this statement, the Neighbourhood Plan uses the 2016 Lambeth Green Infrastructure Strategy as an evidence template informing the policy. There is no Southwark Green Infrastructure Strategy, so the Lambeth Strategy informs the policy in the context of the entire Neighbourhood Plan area.</p>
<p><b>Principles of sustainable development</b></p>	
<p><b>Economic</b></p>	<p>The Lambeth Green Infrastructure Strategy does not include a detailed analysis of the impact of green roofs on economic sustainability. However, it is clear that in a location such as the Neighbourhood Plan Area, green roofs are one of the more viable ways to provide green infrastructure as they do not reduce the amount of land that can be developed on a site, unlike some other forms of green infrastructure. While the inclusion of a green roof may increase build costs for new development, they may improve thermal efficiency through adding to the insulation of buildings (as set out in paragraph 3.13 of the Lambeth Green Infrastructure Strategy). In addition, accessible green roofs have the potential to increase the value of new residential or employment developments as they increase the amount of amenity space available to residents or workers.</p> <p><b>Contribution to sustainable economic development:</b> ○</p> <p>While including a green roof may increase up-front costs, it should have long-term economic benefits. The impact of the policy on this dimension of sustainable development is cautiously marked as neutral, however, we expect that in the long-term there should be at least a minor positive benefit.</p>

<p><b>Social</b></p>	<p>Accessible Green Roofs increase amenity space and, as set out at Paragraph 3.13 of the Lambeth Green Infrastructure Strategy, may be used for sports pitches, play spaces or relaxation spaces among other uses.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>When accessible, as set out in the policy, green roofs can have a positive impact on social sustainability when compared to inaccessible roof spaces, which do not increase the network of open spaces.</p>
<p><b>Environmental</b></p>	<p>The primary driver for this policy is to ensure environmental sustainability is maximised, particularly given this is a part of London that would benefit from urban greening measures as set out in Paragraph 3.5 of the Lambeth Green Infrastructure Strategy. Paragraph 3.13 of the Lambeth Green Infrastructure Strategy states that, in addition to their open space function, accessible green roofs can provide water attenuation, improved thermal efficiency to buildings (thus reducing energy consumption) and absorption of air pollutants. The inclusion of the interpretable “significant proportion” and alternative approaches ensures that the policy does not conflict with other roof uses, most notably Solar Photovoltaics, which also deliver a significant environmental benefit.</p> <p><b>Contribution to sustainable environmental development: ++</b></p> <p>This policy makes a highly significant contribution to sustainable environmental development and its careful wording does not detract from the competing need to ensure sufficient on site renewable energy generation through Solar Photovoltaics.</p>
<p><b>Strategic Development Plan policies</b></p>	
<p><b>London Plan</b></p>	<p>Policy 5.11 expects green roofs to be incorporated in to major development proposals. It further supports the development of more detailed policies on green roofs at the local level. Policy 5.2 expects development proposals to minimise carbon dioxide emissions through using less energy (be lean), supplying energy efficiently (be clean) and using renewable energy (be green). Parts a-c of P3 are in general conformity with these policies as it supports the introduction of green roofs and adds additional detail on what green roofs should be implemented.</p>
<p><b>Lambeth Local Plan</b></p>	<p>Policy Q9 supports developments that maximise opportunities for greening. Parts a-c of P3 uphold the general principle of this policy, which seeks to increase landscaping in the borough. The policy adds a strong amount of detail to Policy Q9 as the Lambeth</p>

	Local Plan does not include any policies related to the provision of green roofs. The rationale for taking this approach stems from the poor air quality in the Neighbourhood Plan Area (as evidenced by its AQMA designation) and the lack of accessible open spaces/ opportunities to create new open spaces at ground floor level.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Core Strategy Policy 13 expects high environmental standards including energy efficiency, use of renewable energy and use of sustainable drainage systems. Saved Southwark Plan Policy 3.13(vi) expects new developments to give consideration to the need to provide high quality landscaping and cites green roofs as a potential means of achieving this. P3 upholds the general principles of these policies and adds a significant amount of additional detail with regards to the provision of green roofs. The rationale for this is that the Neighbourhood Plan is seeking to address poor air quality and operates in the context of an area with limited opportunities for urban greening at ground floor levels.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 4 (P4)</b>	
<b>Policy wording</b>	<p>All major proposals must meet the following criteria:</p> <ol style="list-style-type: none"> <li>a. 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.</li> <li>b. Ensure that the design of publicly accessible open space incorporates public seating and enables ease of pedestrian movement.</li> <li>c. Have regard to 'Guidance for developers' document in Appendix 9.</li> <li>d. Address and mitigate any temporary major loss of amenity in surrounding public open space during construction phases through financial compensation,</li> </ol>

	<p>ring-fenced for green infrastructure projects to be delivered in the neighbourhood area, and</p> <p>e. Mitigate loss of any trees. Where trees must be replaced as part of redevelopment:</p> <ul style="list-style-type: none"> <li>i. replacement trees should be planted according to the advice of a Council or independent arboriculture adviser with reference to the guidelines referred to in policy P4c, or;</li> <li>ii. The CAVAT model should be applied to provide compensation, ring-fenced for implementation of equivalent green infrastructure near to site.</li> </ul>
<b>National policies and guidance</b>	
<b>NPPF</b>	<p><b>Relevant Paragraphs:</b></p> <p>17, 58, 73, 110</p> <p>Paragraph 17 sets out a core planning principle to provide a “good standard of amenity” for all future occupants of land and buildings. This policy has regard to that principle as it seeks to ensure that new developments are designed to incorporate private amenity space for occupants in addition to ground-floor publicly accessible amenity. Collectively this would amount to good standards of amenity space.</p> <p>Paragraph 58 supports development that establishes a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit. The policy addresses this by expecting ground floor open space to be predominantly publicly accessible, allowing people working, living and visiting areas to access new ground floor open spaces (rather than limiting to occupants), which creates a strong sense of place. In addition, the requirement for quality street furniture enhances the sense of place and also increases comfort. The guidance in Appendix 9 adds detail to these requirements.</p> <p>Paragraph 73 sets out the important contribution to health and well-being of communities made by access to high-quality open spaces. Parts a, b and d seek to ensure that a sufficient amount of open space is provided, prioritising publicly accessible open space on ground floors, which brings community benefits, and also seeks to ensure that provision of open space is not temporarily restricted.</p>

	Paragraph 110 supports efforts to minimise pollution and other adverse effects of development on the local environments. In particular, the requirement to replace trees is an important way to ensure that development does not have adverse effects on the local environment.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	As with Policies P1, P2 and P3, the extracts from NPPG related to production of Open Space and Green Infrastructure strategies (Paragraph: 001 Reference ID: 37-001-20140306 and Paragraph: 029 Reference ID: 8-029-20160211) are relevant to this policy as it relates to open space provision and green infrastructure (which includes trees). Therefore, as with the preceding policies these documents informed the preparation of these policies.
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>Open space and green infrastructure bring a range of economic benefits to neighbourhoods and developments, as set out in the Lambeth and Southwark Open Space Strategies (including supporting documents) and the Lambeth Green Infrastructure Strategy. While criteria d) adds a potential financial impact on developers, the allocation of money to local green infrastructure projects could enhance the attractiveness of the area to visitors, companies and potential new residents, which could have wider economic benefits.</p> <p><b>Contribution to sustainable economic development:</b> 0</p> <p>This Policy is also likely to have a long-term economic benefit, but given some up-front (but managed) costs may be incurred, a reasonable assessment is to apportion a neutral impact on economic sustainability.</p>
<b>Social</b>	<p>This policy seeks to improve open space and green infrastructure provision, which are both evidenced to have a positive social impact as set out in the Open Space Strategies of Lambeth and Southwark and Green Infrastructure Strategy of Lambeth. In particular, the inclusion of a mechanism to mitigate the temporary loss of open spaces ensures that the potential negative social impact of development affecting open spaces is reduced.</p> <p><b>Contribution to sustainable social development:</b> +</p> <p>The policy has at least a minor positive impact on social sustainability through ensuring high-quality public open spaces and green infrastructure for the enjoyment of people living, working and visiting the area.</p>
<b>Environmental</b>	This policy primarily seeks to ensure the planning system in the Neighbourhood Plan area contributes to the protection and

	<p>enhancement of environmental sustainability in the long and short-term. The benefit of improved green infrastructure for the environment is well documented in the Lambeth Green Infrastructure Strategy and includes reduction in flood risk, absorption of pollutants and urban cooling. Ensuring trees are adequately replaced is a key way to achieve this aim.</p> <p><b>Contribution to sustainable environmental development: ++</b></p> <p>The policy makes a significant positive contribution towards the achievement of sustainable environmental development.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>The form and amount of amenity space, as included in part a of P3, does not feature in any London Plan strategic policy, however the London Plan does support appropriate amenity space provision. Therefore this aspect of P4 adds additional detail to the general principle of the London Plan, which it supports.</p> <p>Policy 7.5 expects developments to use high quality landscaping, supporting the easy movement of people, and the need to incorporate high quality street furniture. Part b of P3 is in general conformity with this policy as it upholds its general principle, but adds detail in specifying ways these matters can be addressed locally.</p> <p>Policy 7.18 supports the protection of open spaces. Part d of P3 is in general conformity with this policy as it also seeks to protect local spaces, but adds detail in seeking to mitigate the impact of a temporary loss of open space.</p> <p>Policy 7.21 expects the protection, maintenance and enhancement of trees. It expects replacement of any trees lost as a result of development. Part e of P3 is in general conformity with this policy as it upholds its principles and adds a local context in seeking to manage the loss of trees using the CAVAT model.</p>
<b>Lambeth Local Plan</b>	<p>As the expectations of P4 are relatively distinct each criteria are considered separately.</p> <p><u>P4(a)</u></p> <p>Policy H5(b) requires a minimum 10sqm private amenity space per flats and 30sqm per houses. Part a of P4 is in general conformity with this as it expects amenity space to be provided for occupants and it does not compromise this policy as it sets no alternative space standards nor does it contradict any of the</p>

design requirements set out in H5(c). Part a of P4 does, however, add an additional level of detail as it expects amenity space to be provided for all developments, including commercial uses. While the Local Plan does not include a policy expectation related to amenity space for non-residential uses, it does not include any policies that are not in favour of this, so there is no conflict with this policy. The rationale for this approach is that the area is already noted as having a high pressure on open spaces, which could be exacerbated by densification in all uses, not simply residential use. The provision of amenity space for the use of occupants would help to mitigate any further pressure increases on those space. The rationale for favouring amenity space away from the ground floor is to safeguard ground floor areas for publicly accessible open space, another key ambition of the Neighbourhood Plan, which will increase the amount of open space in the neighbourhood and improve its sense of place and legibility.

#### P4(b)

Policy Q6 supports high quality landscaping in the public realm, including robust street furniture. It also expects open spaces to be legible. Part b of P4 is in general conformity with this as it prioritises seating, which is a form of street furniture, and supporting pedestrian movements, which is clearly related to legibility. P4(b) adds detail to Q6 as it identifies seating as a particularly important type of street furniture, something that Q6 does not achieve. In addition, although Q6 mentions legibility and the need to give pedestrian-priority over vehicles, P4(b) connects these expectations and makes clear that new open spaces must prioritise pedestrian movements in particular.

#### P4(c)

This criteria adds additional guidance that builds on a number of policies in the Lambeth Local Plan, adding specific guidance to the policies of the Local Plan. It is in general conformity as the policy simply expects some regard to the guidance rather than seeking to enforce it.

#### P4(d)

Policy EN1 seeks to protect public open spaces from new development. P4(d) is in general conformity with this policy as it relates to the protection of open spaces. However, it adds a level

	<p>of additional detail related to temporary loss of open space, which is not addressed in EN1. The rationale for including this is that with limited open spaces in the neighbourhood plan area even a short-term temporary loss of public open space may have a significant negative impact on the wellbeing of those living in, working in and visiting the area. Exactly what counts as “major loss” P4(d) is not fully defined as this will vary dependent on many criteria such as the usage of the open space, the availability of alternative spaces nearby and the length of the temporary loss. Ultimately it will be up to the relevant local planning authority to determine what counts as major loss, which is appropriate given it would oversee the process.</p> <p><u>P4(e)</u></p> <p>Policy Q10 supports the protection of trees and the appropriate planting of new trees. P4(e) upholds the principle of this Policy. It adds an extra level of detail as Q10 does not include any requirement for lost trees to be replaced, despite setting out support for the planting of additional trees. This policy does not compromise other aspects of Q10 as that policy mostly relates to the protection of existing trees, something that P4(e) does not address or undermine. Crucially, P4(e) does not state that the loss of trees is acceptable, meaning that in order to lose a tree an applicant would still need to meet the requirements of Q10. Instead, it sets out that in situations where the Council agrees that the loss of a tree “must” happen, it has to be replaced or an appropriate financial sum should be paid in order to allow new planting elsewhere. On that basis we assert that this policy upholds the principles of Q10 and is realistic to the fact that there may be occasions, even with the presence of Q10, that the Council accepts the loss of a tree. The CAVAT model is adopted as it is a well-used (across London), transparent and successful model for establishing the value of trees, which is the rationale for selecting it.</p>
<p><b>Southwark Core Strategy and saved Southwark Plan Policies</b></p>	<p><u>P4(a)</u></p> <p>Saved Policy 3.12 expects developments to achieve a high quality of design in order to create high amenity environments for people working in, living in and visiting the area. P4(a) upholds the principle of this and adds detail to this by specifying that amenity space should be provided for the enjoyment of occupiers. There is no specific policy related to the provision of amenity space. This provision is included in response to the high pressure on open space in the neighbourhood plan area, which</p>



can be mitigated somewhat by ensuring developments have specific amenity space for users.

P4(b)

Core Strategy Policy 11 requires new developments to increase the network of open spaces, particularly in areas deficient of open space. P4(b) adds detail to this by requiring those spaces to be publicly accessible, which is important in the context of the neighbourhood plan area, which has high footfall and is used by a number of visitors. Saved Policy 3.13 expects new development to give consideration to public spaces. P4(b) upholds that principle but strengthens the expectation on developers to provide publicly accessible open space in the context of the neighbourhood.

Saved Policy 3.13 expects new development to include street furniture, which P4(b) upholds and adds detail to by specifically requiring seating in addition to other forms of furniture. This is necessary as the area generates a high footfall of visitors.

P4(c)

This provision adds guidance to a number of Southwark policies related to design, most notably Policy 3.13. It upholds the principle of those policies and the guidance adds additional useful considerations for developers and LB Southwark to consider.

P4(d)

Core Strategy Policy 11 supports the protection of open spaces in the borough from inappropriate development. Saved Southwark Plan Policy 3.27 supports the protection of Other Open Spaces and will only allow loss should various criteria be met. These policies do not address temporary loss of public open spaces. This policy therefore upholds the principles of Policy 11 and adds detail related to temporary uses. The justification for adding this detail is the same as set out in the Lambeth Policy Consideration section, namely that there is an intense pressure on public open spaces in the area and temporary loss can still have an adverse impact on those living in, working in and visiting the area without mitigation.

P4(e)

	<p>Core Strategy Policy 11 seeks to prevent the loss of trees and to improve access to trees. Policy P4(e) upholds the principle of Policy 11 as it does not support the loss of trees. It does, however, add detail of the expected approach should exceptional circumstances be considered by the Council to justify the loss of trees. This approach would ensure that the aim of Strategic Policy 11 to improve access to trees is not compromised.</p>
<p><b>Summary</b></p>	
<p>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</p>	

<p><b>Policy 5 (P5)</b></p>	
<p><b>Policy wording</b></p>	<p>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:</p> <ul style="list-style-type: none"> <li>i. Replacement of developments incorporating car parking with car free developments and electric vehicle charging points</li> <li>ii. Incorporation of air filtration systems to improve indoor air quality for occupants</li> <li>iii. Implementation of green infrastructure</li> <li>iv. The use of low-pollution vehicles during construction</li> <li>v. Freight consolidation arrangements</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>a. Create an improved, pedestrian friendly streetscape, encouraging walking as the primary mode, as set out in local and TfL guidance'</li> <li>b. Contribute to an improvement in air quality and a reduction in noise levels</li> </ul> <p>c) Development of Waterloo Station will not be supported unless measures are introduced to restrict diesel taxis and diesel freight vehicles serving the Station.</p>

**National policies and guidance**

<p><b>NPPF</b></p>	<p><b>Relevant paragraphs:</b></p> <p>17, 35, 120, 124</p> <p>Paragraph 17 expects the planning system to make the fullest possible use of walking. This policy supports the promotion of walking by supporting the establishment of high-quality greenways, which would promote a modal shift towards walking through the introduction of high-quality, less polluted walking routes.</p> <p>Paragraph 35 expects Plans to include policies that seek to create safe and secure layouts which minimise conflict between different forms of traffic (e.g. pedestrians, cyclists or cars). This policy has regard to the statement by seeking to promote pedestrian routes ("greenways") that are located away from highways.</p> <p>Paragraph 120 states that policies and decisions should be formed in the context of preventing risks from pollution. This policy has regard to that statement as it seeks to reduce pollution levels and exposure to pollutants. In addition, it specifically focuses on more dangerous forms of pollution such as diesel vehicles.</p> <p>Paragraph 124 states that planning policies should contribute towards EU limit values and national objectives for pollutants, including in Air Quality Management Areas (AQMA). The Neighbourhood Plan Area is in an AQMA so the provisions in this policy are crucial to meet Paragraph 124.</p>
<p><b>NPPG/ Written Ministerial Statements</b></p>	<p><b>Relevant paragraphs:</b></p> <p>Paragraph: 003 Reference ID: 32-003-20140306</p> <p>This paragraph states that:</p> <p><i>"Air quality concerns can be relevant to neighbourhood planning, and it is important to consider air quality when drawing up a neighbourhood plan or considering a neighbourhood development order. The local planning and environmental health departments will be able to advise whether air quality could be a concern."</i></p> <p>Given the Neighbourhood Plan Area is in an Air Quality Management Area, there is clear evidence that air quality is relevant to the Neighbourhood Plan and therefore it has regard</p>

	to this paragraph in Planning Practice Guidance and seeks to address poor air quality.
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>Poor air quality puts a significant burden on the economy, as set out in the <i>Air Quality in Lambeth: A Guide for Public Health Professionals</i> (2013) and the namesake guide for Southwark (2012), each prepared by the Greater London Authority. The Southwark version estimates (at Paragraph 6.2) that the annual cost of air pollution to the economy nationally was £15 billion in 2008. As an area recognised for its poor air quality, the Neighbourhood Plan Area will have residents that add to this cost through accessing health services. While there would be some costs associated with delivering Policy 5 in the short-term, the long-term economic benefit of having planning policies that seek to reduce air pollution is clear. In addition, both the Lambeth and Southwark guides draw awareness to fact that cleaner air reduces the frequency of which local authorities (and other owners of buildings) are required to maintain and clean buildings and replace trees and planting.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>While this policy would add some costs in the short-term, the healthcare cost benefits of reducing exposure to poor air quality are clear and therefore this policy makes at least a minor positive contribution to sustainable economic development.</p>
<b>Social</b>	<p>According to the GLA in 2017, and based on research from Kings College London, poor air quality caused around 9,400 premature deaths in 2010 alone. In particular, micro-particulates, such as those found in diesel, are noted as being a major cause of premature deaths. The provisions of this policy would help ensure that a meaningful reduction in the emission of harmful pollutants is delivered in the Neighbourhood Plan Area, making a major contribution to the principle of sustainable social development.</p> <p>Introduction of greenways would work towards improving the health of people in the area and in addition would improve the network of open spaces and green infrastructure, which would bring about social benefits as previously evidenced in this statement.</p> <p><b>Contribution to sustainable social development: ++</b></p> <p>It is clear that a policy that includes tangible measures to reduce exposure to poor air quality in the Neighbourhood Plan Area</p>

	would make a substantial contribution towards sustainable social development.
<b>Environmental</b>	<p>In addition to causing poor health to humans, the Air Quality Reports for Lambeth and Southwark note that poor air quality harms biodiversity including plants and trees and leads to premature deaths. In addition, the effect on the built environment can cause harm to heritage assets.</p> <p><b>Contribution to sustainable environmental development: ++</b></p> <p>Much like the social contribution this policy makes, it also makes a significant positive contribution to sustainable environmental development, including to biodiversity and the built environment.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 7.14 sets out the Mayor’s commitment to tackling air quality, followed by a number of measures, which the Policy does not conflict with. The criteria set out in P5(a) and P5(c) add detail to the provisions in Policy 7.14.</p> <p>Policy 6.9 and Policy 6.10 support high quality walking environments. P5 adds a local context to this policy in identifying greenways that can provide high quality walking environments.</p>
<b>Lambeth Local Plan</b>	<p><u>P4(a) and P4(c)</u></p> <p>While the Local Plan has no policies specifically related to air quality, it does have policies that support environmental sustainability, such as Policy D1. In addition Policies T2 and T3 support use of sustainable means of transport as opposed to polluting uses. Therefore, P4(a) and P4(c) support these policies by adding a number of specific expectations that should support tangible air quality improvement in the Neighbourhood Plan area. While some of these expectations are quite stringent, particularly P4(c), this is considered to be justifiable in the context of the extremely poor air quality in the area, which is connected to a number of premature deaths as set out in the sustainable development section (evidence relates to London as a whole).</p> <p><u>P4(b)</u></p> <p>Policy T1 sets a hierarchy of traffic priority, of which walking is the most important. Policy T2 seeks to promote walking through creating safer, quicker, more direct and more attractive walking routes. It further states that routes will be improved by the Council, giving greater priority to pedestrians. Policy Q6 echoes the need for high quality pedestrian environments and Policy PN1</p>

	notes that routes in the Neighbourhood Plan Area can be improved. P4(b) is in general conformity with and supports the principle of all these policies. It adds a local detail in seeking to identify exact locations of improved pedestrian routes and also notes the impact of air quality and noise on the quality of the pedestrian environment. It does not contradict the detail of any of these policies.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	<p><u>P4(a)</u></p> <p>Saved policy 3.6 states that planning permission will not be granted for development that would lead to a reduction in air quality. Strategic Policy 13 expects development to improve environmental standards, including air quality and lead to a reduction in air pollution. The measures set out in Policy P4(a) uphold the principles of these policies and add a number of tangible methods for improving air quality that are not set out in the Southwark Policies. These are proposed due to evidence supporting these methods as means of improving air quality and are set in the context of what is likely to be achievable in the Neighbourhood Plan area.</p> <p><u>P4(b)</u></p> <p>Strategic Policy 2 supports planning places with priority for walking and Strategic Policy 11 supports the improvement of access between open spaces. P4(b) supports the principle of these policies and adds detail by identifying greenways that can provide high-quality pedestrian environments connecting open spaces.</p> <p>P4(c) does not relate to Southwark.</p>
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 6 (P6)</b>	
<b>Policy wording</b>	The utilisation of vacant development sites with planning consent for temporary community 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 community uses, both community and commercial. Where planning permission is required to bring sites into temporary use, this will normally be supported.
<b>National policies and guidance</b>	
<b>NPPF</b>	No content on temporary uses.

<p><b>NPPG/ Written Ministerial Statements (where applicable)</b></p>	<p>NPPG supports temporary use of sites prior to long term regeneration plans coming forward (a meanwhile use) or more generally to encourage empty property to be brought back into use (Paragraph: 014 Reference ID: 21a-014-20140306). P6 has regard to this as it seeks to support temporary (“meanwhile”) uses where possible during periods of long-term redevelopment of sites in the Neighbourhood Plan Area.</p>
<p><b>Principles of sustainable development</b></p>	
<p><b>Economic</b></p>	<p>Temporary uses provide opportunities for efficient use of land, supporting social enterprises and small businesses. Given the Policy pragmatically seeks opportunities for temporary uses within the phasing plans of developers, there should be no negative impact on sustainable economic development.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>This policy seeks to facilitate opportunities for small and medium enterprises or community groups to use sites that would otherwise sit vacant while awaiting long-term redevelopment to come forward. In most instances this would support economic growth in the area and there are no discernible negative impacts. On that basis a minor positive contribution to the sustainable economic development of the area is apportioned.</p>
<p><b>Social</b></p>	<p>Use of vacant sites for temporary periods can free up facilities and sites for local businesses and community groups, contributing to the employment of local people and community cohesion. In addition, ensuring continued use of sites can discourage antisocial behaviour, which is often associated with vacant sites, and therefore increase safety.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>Supporting “meanwhile” uses of vacant sites and land can create opportunities for affordable facilities for small businesses and community groups and can also prevent crime and safety issues often associated with vacant sites and land.</p>
<p><b>Environmental</b></p>	<p>Use of vacant sites for temporary food production, as suggested in the policy, can bring a number of environmental benefits. While use of vacant land may increase emissions or other impacts on the environment, this would depend on the type of use.</p> <p><b>Contribution to sustainable environmental development: o</b></p>

	It is not possible to fully identify the contribution this policy makes to environmental sustainability, given this will depend entirely on the nature of proposed temporary uses.
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Temporary sports facilities are supported by Policy 3.19 and Policy 7.22 supports the use of land for food production. P6 is in general conformity with these policies as it seeks to encourage temporary use of sites as sporting facilities and food production. It adds detail in requiring a Plan detailing how land will be made available for temporary use, which is in accordance with the principles of Policies 3.19 and 7.22.
<b>Lambeth Local Plan</b>	<p>Policy ED11(d) supports use of vacant commercial premises for community activity and Policy EN2(a) supports the temporary use of vacant land for food production. Therefore the principle of P6 is in general conformity with the principle of these Policies. It adds an additional level of detail as it actually expects, rather than encourages, consideration of temporary uses and it actually sets a framework for the delivery of temporary uses.</p> <p>In terms of delivery, Policy T8 requires a construction management plan, which the construction and phasing plan could become a part of. Therefore this aspect of the policy is in general conformity with the need to set out the construction process as required by T8, while adding an additional requirement of that document.</p>
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Saved Policy SP20 supports temporary planning permission that makes good use of a vacant site prior to the commencement of a permanent scheme. Policy 1 supports development that improves places within the borough and allow a better quality of life for residents. P4 upholds the principles of these policies and adds detail in setting out how developers must make sites available for temporary use.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

4.10 Each policy in this chapter has regard to the NPPF and NPPG (where applicable), supports the principles of sustainable development and is in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policies in this chapter meet the Basic Conditions.

## 5 Housing



5.1 This chapter contains Policies 7-9, which are addressed in turn.

<b>Policy 7 (P7)</b>	
<b>Policy wording</b>	<p>New affordable housing made available for the following target groups would be supported:</p> <ul style="list-style-type: none"> <li>a. Low-to-middle income people working within the neighbourhood area</li> <li>b. Elderly people from the area including those in need of live-in care</li> </ul>
<b>National policies and guidance</b>	
<b>NPPF</b>	<p><b>Relevant Paragraphs:</b></p> <p>50</p> <p>Paragraph 50 encourages planning policies to plan for a wide variety of homes, in terms of size, type and tenure. In particular it supports the production of policies for the provision of affordable housing. P7 has regard to this as it seeks to ensure that types of homes less commonly seen in the Neighbourhood Plan Area are encouraged (but not enforced).</p>
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>The ambition of this policy to encourage the delivery of affordable housing in the Neighbourhood Plan Area is important as it enables businesses to access a broad supply of staff from the local area. The fact that the policy supports delivery of these types of houses, but does not enforce it upon applications involving residential development, helps to ensure that there is no negative impact on the viability of residential development in the Neighbourhood Plan Area. It also seeks to ensure that elderly people in the Neighbourhood Plan Area</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>This policy could have a long-term positive economic impact through ensuring that low and medium income residents can live near to places of employment. The wording of the policy does not put an unachievable requirement on developers so it does not restrict the ability to deliver new housing for the benefit of the local economy.</p>

<p><b>Social</b></p>	<p>With rising house prices in London, the ability for middle-low income earners to live close to areas with a high concentration of jobs, such as the Neighbourhood Plan Area, is becoming unachievable for low and middle income households. The Lambeth Housing Strategy 2017-2020 notes that the average house price in Lambeth is £531,000. This figure will be significantly higher in the Neighbourhood Plan Area, including the part of the area in Southwark. The Lambeth Housing Strategy also notes that the proportion of residents in the Borough over the age of 75 is set to increase by 6.25% by 2020 and 18.75% by 2022. This policy seeks to encourage development of housing that would allow a mixed community to continue to live in the Neighbourhood Plan Area. This would have wide-ranging social benefits, most notably allowing long-term residents of the area to continue living in the area rather than getting “priced out” or having to move due to a lack of supported accommodation.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>This policy seeks to promote a mixed community living in the neighbourhood plan area and therefore makes a contribution towards sustainable social development. Crucially, it does not seek to prioritise housing for particular groups over others. Instead it states support in the event housing for the identified groups comes forward.</p>
<p><b>Environmental</b></p>	<p>This Policy relates to the occupiers of new residential development and therefore its impact on environmental sustainability is limited.</p> <p><b>Contribution to sustainable environmental development: o</b></p> <p>This policy has relatively limited environmental effects.</p>
<p><b>Strategic Development Plan policies</b></p>	
<p><b>London Plan</b></p>	<p>Policy 3.6 encourages consideration of the needs of older people when designing new housing. Policy 3.9 supports mixed and balanced communities across London, facilitated through a mix of tenure options. Policy 3.11 seeks to maximise affordable housing provision in London. P7 is in general conformity with these policies as it seeks to support affordable housing and specialist housing for older people <u>without seeking to restrict or not support other types of housing delivered in line with need.</u></p>
<p><b>Lambeth Local Plan</b></p>	<p>Policy H1 supports a mix of housing types and tenures and Policy H2 seeks to maximise affordable housing. Policy H8 supports accommodation that meets a specific local community need. As it is worded, P7 does not deviate from the ability of LB Lambeth to</p>

	<p>deliver affordable housing in line with its policies. However, P6 does suggest that where also in accordance with LB Lambeth's policies, the Neighbourhood Plan would support particular types of targeted affordable housing. Although the LB Lambeth consultation response identifies a conflict in this regard, we do not consider it as such because the wording does not seek to override LB Lambeth's policies on affordable housing. <u>Instead it states that where a proposal comes forward for these types of housing, the Neighbourhood Plan would support the proposal notwithstanding conformity with Lambeth's housing policies.</u></p>
<p><b>Southwark Core Strategy and saved Southwark Plan Policies</b></p>	<p>Strategic Policy 6 seeks to provide a range of homes for people on different incomes and seeks to deliver 665 affordable units in the Bankside, Borough and London Bridge Opportunity area. Policy 4.4 states that affordable housing in the Central Activities Zone should be 70% socially rented and 30% intermediate. Policy 4.7 supports housing that supports specific identified user groups (including the elderly), subject to criteria. As with the relevant Lambeth Policies, P7 does not seek to undermine the policies of the Southwark Development Plan, but supports the identified types of housing to be delivered in the Neighbourhood Plan Area. In that sense it is upholding the principles of the Southwark Development Plan in seeking to provide affordable housing and specialist housing for older residents. As with the comment on Lambeth's</p>
<p><b>Summary</b></p> <p>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</p>	

<p><b>Policy 8 (P8)</b></p>	
<p><b>Policy wording</b></p>	<p>Proposals which incorporate features to accommodate one or more of the target groups identified in P5 will be supported. These include, but are not limited to:</p> <ul style="list-style-type: none"> <li>i. Co-housing</li> <li>ii. Unit sizes that maximise space and affordability by closely aligning with minimum space standards in the London Plan.</li> </ul>
<p><b>National policies and guidance</b></p>	
<p><b>NPPF</b></p>	<p><b>Relevant Paragraph:</b> 50</p> <p>NPPF Paragraph 50 encourages planning policies to identify the size and type of housing required in particular locations, reflecting</p>

	local demand. P8 has regard to this in seeking to encourage housing that maximises space (in the form of co-housing), while supporting housing to align with but meet minimum space standards set out in the London Plan.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>This Policy contributes to economic development in a similar way to P7 through seeking to accommodate alternative and more affordable types of housing in an area that experiences high house prices (as set out in the Lambeth Housing Strategy).</p> <p>The part of the policy relating to minimum space standards should have no noticeable economic impact on the area given the London Plan space standards are in force and are expected of all residential development.</p> <p><b>Contribution to sustainable economic development: 0</b></p> <p>The policy will have a negligible impact.</p>
<b>Social</b>	<p>As with Policy P7, this policy makes a contribution towards encouraging a diverse community.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>The policy will have a minor positive impact.</p>
<b>Environmental</b>	<p>This policy should make a negligible impact on environmental sustainability.</p> <p><b>Contribution to sustainable environmental development: 0</b></p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 3.5 sets out minimum size standards for new dwellings (Table 3.3). P8 actively encourages these standards and is therefore in general conformity with this policy. It does not add any additional detail to this policy as such but reinforces support for units towards the minimum space standards.</p> <p>Policy 3.5 also encourages the use of communal spaces. The proposal for co-housing in P8 is in general conformity with this policy and adds an additional level of detail in encouraging proposals specifically for co-housing.</p>
<b>Lambeth Local Plan</b>	<u>P8(i)</u>

	<p>Policy H8 supports housing that “meets specific community needs” subject to a number of criteria. P8(i) is intended to meet specific needs of people who wish to live in co-housing units, therefore adding to Policy H8. Therefore, this aspect of P8 is in general conformity with the most relevant Local Plan policy. Furthermore, it does not undermine the series of requirements set out in P8, which could be applied to co-housing proposals. In addition other housing policies, such as H2 and H4, are not undermined and therefore P8(i) is in general conformity with these.</p> <p><u>P8(ii)</u></p> <p>The Lambeth Local Plan does not include reference to minimum space standards, presumably because this is in the London Plan. However, there are no policies that seek to amend the London Plan space standards, so P8(ii) is not in conflict with the Local Plan.</p>
<p><b>Southwark Core Strategy and saved Southwark Plan Policies</b></p>	<p><u>P8(i)</u></p> <p>There are no policies in the Development Plan that specifically support co-housing, so this aspect of P8 adds a specific level of detail to the Development Plan. It continues to uphold the principles of the housing policies as co-housing may be provided at a mix of size and tenures.</p> <p><u>P8(ii)</u></p> <p>As with Lambeth, the Development Plan does not include policies related to space standards, however, saved Policy 4.2 supports good quality living conditions. P8(ii) upholds the principles of Policy 4.2 by supporting housing that is within the London Plan minimum space standards.</p>
<p><b>Summary</b></p>	
<p>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</p>	

<p><b>Policy 9 (P9)</b></p>	
<p><b>Policy wording</b></p>	<p>Where affordable housing cannot be delivered on site, consideration should be given to making land in the neighbourhood area available to a local designated Community</p>

	Land Trust to bring forward affordable housing in partnership with a registered housing provider.
<b>National policies and guidance</b>	
<b>NPPF</b>	Paragraph 50 of the NPPF supports on site affordable housing unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified. P8 has regard to this statement as it presumes that in the first instance on-site affordable housing should be sought, but builds in a contingency approach for when this demonstrated to not be feasible.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	This policy will make a negligible contribution to economic sustainable development as it does not alter the amount of affordable housing sought on developments, simply setting out a preferred approach in the event that an off-site affordable housing contribution is pursued.  <b>Contribution to sustainable economic development: 0</b>
<b>Social</b>	A community land trust involves a broad range of local stakeholders and help build cohesive communities in partnership with Registered Social Landlords. Therefore, when compared to current social housing provision, there is an expectation that this policy will make a minor positive contribution towards the achievement of social sustainability.  <b>Contribution to sustainable social development: +</b>
<b>Environmental</b>	This policy relates to the occupiers of residential buildings and therefore will make a negligible contribution to environmental sustainability.  <b>Contribution to sustainable environmental development: 0</b>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Policy 3.12 states that affordable housing should normally be provided on-site, further stating that in exceptional cases where it can be demonstrated robustly that this is not appropriate it may be provided off-site. P9 is in general conformity with this policy as it does not alter the approach set out, but it adds detail in encouraging a particular method for the delivery of off-site affordable housing.

<b>Lambeth Local Plan</b>	Policy H2 states that affordable housing should be provided on site and where this cannot be practically achieved off-site affordable accommodation provided by the developer may be accepted. Furthermore, it states that exceptionally a payment in lieu may be accepted in exceptional circumstances. The policy also states that on sites providing fewer than 10 units a payment in lieu will be sought. P9 is in general conformity with H2 as it does not seek to reorder the hierarchy that is in favour of on-site provision. It does, however, set a distinct local approach to off-site delivery, in seeking to support Community Land Trusts. However, in choosing flexible wording, it allows LB Lambeth to determine itself if delivery through a Community Land Trust is suitable, which allows a case-by-case approach to determining how off-site affordable housing should be delivered.
<b>Southwark Core Strategy</b>	Strategic Policy 6 seeks to require as much affordable housing on-site as reasonably possible. It does not mention off-site provision. As with Lambeth, P9 upholds the principle of Policy 6 as it does not seek to change the favoured approach to affordable housing delivery. However, it adds detail in specifying a preferred approach (where feasible) when off-site provision is deemed acceptable.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

5.7 Each policy in this chapter has regard to the NPPF and NPPG (where applicable), supports the principles of sustainable development and is in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policies in this chapter meet the Basic Conditions.

## 6 Development Management

6.1 This chapter contains Policies 10 and 11, which are addressed in turn.

<b>Policy 10 (P10)</b>	
<b>Policy wording</b>	<p>The neighbourhood recognises the inevitable demand for hotel developments in the area. Any proposal must mitigate the development's impact on the existing dynamics of the residential, business and social communities, including:</p> <ol style="list-style-type: none"> <li>1. Provide as much retail frontage as possible to a high street, where the units made available only have high street access.</li> </ol>

	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>4. Developments should continue to engage with local recruitment mechanisms to ensure local candidates are employed wherever possible.</li> </ol>
<b>National policies and guidance</b>	
<b>NPPF</b>	<p><b>Relevant paragraphs:</b> Glossary, 23, 70.</p> <p>The glossary regards hotels as a town centre use. The Neighbourhood Plan has regard to this through encouraging hotel use, as the Neighbourhood Plan Area is within the Central Activities Zone of London and may therefore be broadly regarded as "town centre" in nature.</p> <p>Paragraph 23 supports policies that seek to support the viability and vitality of town centre uses, ensuring existing markets remain attractive and competitive. P10 has regard to the statements in Paragraph 23 as it gives support to hotel uses, which bring visitors to the area, while protecting existing food and drink retailers and seeking an increase in retail floorspace alongside new hotel uses.</p> <p>Paragraph 70 supports the delivery of community facilities, including through shared space provision. This Policy has regard to this paragraph as it is supportive of "dual use" hotels, which deliver opportunities for community use through making spaces available to local people.</p>
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	Hotels are an important part of the visitor economy, providing accommodation for tourists, businesses and family visits. In 2013 GLA Economics produced a report titled <i>"Understanding the demand for and supply of visitor accommodation in London to 2036"</i> . That Report stated that in 2012, nearly 15.5 million people visited London and spent over £10 billion. The Report also



	<p>estimated an undersupply of visitor accommodation in London when compared to projections of future demand, setting a target for each Borough. Lambeth Councils latest assessment of Hotels and Other Visitor Accommodation (2017), suggests that there is still an under delivery of new visitor accommodation in the borough. Through supporting growth in visitor accommodation, the policy is helping to achieve sustainable economic development. In addition, the support for retail units as part of new hotel development further enriches the local retail offer, in an area that, according to the Lambeth Retail and Town Centre Needs Assessment (2013), could benefit from improved retail facilities (many current units are regarded as “low quality) and currently has a poor comparison retail offer. The support for limited in-house food and drink outlets helps to ensure the long-term sustainability of those retail units in the Neighbourhood Plan Area, which totalled over 30% of retail units in the Lower Marsh/The Cut area in 2013 according to the Lambeth Retail and Town Centre Needs Assessment.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>This policy supports the considered economic growth of the Neighbourhood Plan Area. Its requirements do not place an onerous financial burden on applicants, but do include measures that seek to ensure that the positive economic development impact of hotels do not result in any unintended consequences for local retailers.</p>
<b>Social</b>	<p>The policy seeks to ensure jobs are, in the first instance, advertised to local people. This has a social impact through embedding new hotel uses in the local community. In addition, employing local people can help to reduce unemployment locally.</p> <p>The requirement to open hotel facilities for community use is another crucial way to embed hotels in the local community. It also provides local community groups with an additional local venue, supporting the enhancement of these community groups. Many local businesses in the Neighbourhood Plan Area are independent restaurants, bars and other food and drink retailers. This policy seeks to ensure the longevity of these businesses, which perform an important social role in the area.</p> <p><b>Contribution to sustainable social development: ++</b></p> <p>The policy includes a number of requirements that intend to enhance local social sustainability.</p>

<b>Environmental</b>	<p>This policy makes a limited contribution to environmental sustainability, however, the requirement for retail units on high-street facades will enhance the built environment through ensuring active frontages.</p> <p><b>Contribution to sustainable environmental development:</b> o The Policy has a negligible impact on the environment.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 7.4 supports proposals that enhance local character. Part 1 of P10 upholds the principle of this and adds detail in seeking to ensure that character is maintained by new hotel developments through including ground floor active frontages.</p> <p>Policy 3.16 sets out a need in London for additional community facilities, setting out support for proposals that include social infrastructure. Part 2 of P10 upholds the principle of this as it seeks to address deficiency in the local area, adding detail by expecting hotels to contribute to the provision of community facilities.</p> <p>Policy 4.8 supports town centre development that supports a successful, competitive and diverse retail sector. Part 3 of P10 supports this approach as it seeks to protect the success of local food and drink venues, a provision that adds detail to Policy 4.8.</p> <p>Policy 4.12 seeks to improve employment opportunities for all Londoners and to remove barriers to employment. Part 4 of P10 upholds this policy and seeks to deliver it through adding additional detail on how this should be achieved through hotel developments.</p> <p>P10 is in general conformity with the relevant London Plan policies.</p>
<b>Lambeth Local Plan</b>	<p>Policies ED12 and PN1 support the delivery of hotels in the Neighbourhood Plan Area. In acknowledging that future hotel development will take place, the policy upholds the principle of those policies and is in general conformity with them. The Policy does not contradict any of the requirements of Policy ED12, but it does add a set of distinct local requirements of hotels.</p> <p>Part 1 of P10 relates to Policy Q7 in support good design (active ground floor uses) and it also is in general conformity with Policy ED6 in expecting retail uses at ground floor level in the Central Activities Zone. It adds detail to this by applying that context specifically to hotel development.</p>

	<p>Part 2 of P10 is in general conformity with Policy S2, which supports new community use subject to criteria. There is no reference in Policy S2 to community use of hotel facilities, so Part 2 adds a distinctive level of local detail to this policy. The reason for doing so is to ensure that new hotel development is to the benefit of local community groups, in an area that currently has a limited supply and range of community venues.</p> <p>Policy ED6 states support for retail uses in town centres. Part 3 of P10 seeks to support local shops by asking for 'in-house' food and drink options to be limited. The policy seeks to do this as the Neighbourhood Plan wants to support the vitality and viability of existing retailers in the Neighbourhood Plan area and prevent any negative consequences arising from new hotel development on those units.</p> <p>Policy ED14 seeks to maximise opportunities for employment of local people, which is in line with Part 4 of P10. While Part 4 of P10 does not add any detail to this, it does show how this expectation specifically applies to hotels as well as B-class uses.</p> <p>The use of planning obligations to secure the above benefits is consistent with Policy D4, particularly parts (b)(i) and (b)(iv). In the case of (b)(i) an additional level of detail is included on what type of community use should be secured.</p>
<p><b>Southwark Core Strategy and saved Southwark Plan Policies</b></p>	<p>Saved Policy 1.12 supports hotel provision in areas with high public transport accessibility. In acknowledging the likelihood of hotel development coming forward in the Neighbourhood Plan Area, the Neighbourhood Plan upholds the principle of this policy.</p> <p>Strategic Policy 3 supports successful town centres with a wide range of shops, services and facilities. Parts 1 and 3 of P10 uphold this approach and add an extra level of detail by specifically expecting hotel developments to include provision for these uses.</p> <p>Policy 4 seeks to provide a network of community spaces in the Borough. Part 2 of P10 seeks to ensure the delivery of this by adding a specific requirement for hotels to include community use provision.</p> <p>Policy 10 seeks to target new jobs and training opportunities which arise from development towards local people. Part 4 of P10</p>

	is in accordance with this and relates it specifically to hotel provision.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 11 (P11)</b>	
<b>Policy wording</b>	The facades of all new developments should be treated with a permanent anti-graffiti coating.
<b>National policies and guidance</b>	
<b>NPPF</b>	The NPPF does not include reference to graffiti, but Paragraph 58 supports design that reduces opportunities for crime and disorder, which this policy has regard to in seeking to restrict opportunities for antisocial behaviour in the form of graffiti.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	There is no relevant reference in NPPG.
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>The policy may have a positive long-term economic impact, as anti-graffiti coating is relatively inexpensive and may save money in the long-term when compared to cleaning costs. In addition, in a wider sense, graffiti can make an area less attractive to prospective residents and local businesses, so measures that seek to reduce the amount of graffiti can be to the benefit to the attractiveness of the Neighbourhood Plan Area.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>Although this policy will not have a major impact on sustainable economic development, it adds to the ability of the Neighbourhood Plan area to present itself as an attractive place to locate. It may also be more cost-effective than removing graffiti.</p>
<b>Social</b>	<p>Graffiti is often recognised as a symbol of anti-social behaviour and can be offensive in its nature. Efforts to prevent graffiti will have a positive impact on social sustainability, ensuring people that work, visit and live in the neighbourhood plan area feel able to safely move around it.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>While this policy has a relatively minor impact in this regard, it does make a contribution towards social sustainability.</p>

<b>Environmental</b>	As with the social and economic dimensions, this policy will have a somewhat beneficial impact on environmental sustainability, through ensuring the attractiveness of the built environment cannot be compromised through antisocial behaviour.  <b>Contribution to sustainable environmental development: +</b>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Policy 7.3 supports measures that seek to design out crime. P11 upholds the principle of this policy and adds a distinct requirement of how developers should design out crime through appropriate design.
<b>Lambeth Local Plan</b>	Policy Q3 supports efforts to design out crime and anti-social behaviour. P11 is in general conformity with the principle of this policy but adds a distinct level of detail by requiring a particular crime prevention measure in the form of anti-graffiti coating.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Saved Policy 3.14 expects development to design out crime and sets a number of criteria that could achieve this. Anti-graffiti coating is not one of these, so Policy P11 upholds the principle of 3.14 and adds an additional criteria to help achieve it.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

6.5 The policies in this chapter have regard to the NPPF, support the principles of sustainable development and are in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policies in this chapter meets the Basic Conditions.

## 7 Retail and work

7.1 This chapter contains Policies 12 to 15, which are addressed in turn.

<b>Policy 12 (P12)</b>	
<b>Policy wording</b>	Within appropriate locations for retail uses, the Neighbourhood Plan supports proposals that provides retail units with the following characteristics: <ul style="list-style-type: none"> <li>i. Interiors fitted out to RIBA category B standard and made available for temporary or pop-up use.</li> <li>ii. A range of unit sizes including units with shop floors under 20 sq. / m.</li> </ul>
<b>National policies and guidance</b>	

<b>NPPF</b>	<p><b>Relevant paragraphs:</b> 23</p> <p>Paragraph 23 supports provision of a range of suitable sites to meet the scale and type of retail development needed in town centres. P12 has regard to this statement as it seeks to ensure units suitable for smaller businesses, including independent businesses are available. The availability of sites for temporary use supports entrepreneurialism through reducing the risk associated with long-term leases.</p>
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	<p>NPPG supports temporary use of sites prior to long term regeneration plans coming forward (a meanwhile use) or more generally to encourage empty property to be brought back into use (Paragraph: 014 Reference ID: 21a-014-20140306). P12 has regard to this statement in supporting temporary/pop-up retail units.</p>
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>The latest Lambeth Retail Needs Assessment was prepared in 2013, which stated that around 12% of units on Lower Marsh and The Cut were vacant. While this is not likely to be the same, it suggests that there would be a benefit to encouraging temporary occupiers for the benefit of the vitality and viability of the two main high streets in the area. Likewise that assessment notes the current poor quality of many retail units, so ensuring units are designed to a good standard would improve the local offer to retailers. Ensuring that a range of unit sizes are provided, including some under 20sqm, enhances the areas attractiveness to a wider range of retailers.</p> <p><b>Contribution to sustainable economic development: ++</b></p> <p>The policy seeks to ensure that a broad range of retail units are available, in terms of size and tenure, fitted out to a high quality. This enhances its attractiveness to retailers, which could help to draw more shoppers to the area. This ensures the policy makes a substantial contribution to the sustainable economic development of the Neighbourhood Plan Area.</p>
<b>Social</b>	<p>The Mary Portas review (2011) recommends the encouragement of temporary/ pop-up retail uses, which are a possible vehicle to encourage local talent, as mentioned in the Lambeth Retail Needs Assessment. The same can be said for smaller units, as the rent cost is lower and therefore reduces the risk associated with becoming a retail start-up.</p> <p><b>Contribution to sustainable social development: +</b></p>

	This policy encourages a range of retail units, which could support local people to open retail establishments, as opposed to high street retailers, which often prefer large units and long-term leases. This is to the benefit of local social sustainability.
<b>Environmental</b>	<b>Contribution to sustainable environmental development:</b> o  This policy makes a negligible contribution to environmental sustainability.
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Policy 4.8 supports town centre development that encourage a successful, competitive and diverse retail sector. Policy 4.9 supports policies that seek to provide small retail units. P12 upholds the principle of these policies as it supports the delivery of high quality retail units, including smaller units. It adds detail in specifying a requirement for units under 20sqm and at fit out to RIBA standards.
<b>Lambeth Local Plan</b>	Policy ED6 sets out a number of provisions in support of shops in town centres, including proposals to improve retail units. In addition, Policy PN1 supports retail use in The Cut/Lower Marsh area, which the policy also seeks to do. This Policy adds detail by setting a local design standard and prioritising the delivery of smaller units below 20sqm. The rationale for this approach is set out in the sustainability review of this policy.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Policy 3 supports successful town centres with a wide range of shops and seeks to protect small retail units. Saved Policy 1.7 supports retain developments in Bankside at an appropriate scale. P12 adds detail to these policies in specifically seeking smaller units and higher quality shop interiors in the neighbourhood plan area, which is appropriate to local character and upholds the principles of the development plan.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 13 (P13)</b>	
<b>Policy wording</b>	In the Lower Marsh and The Cut CAZ retail frontages, planning applications will be required to: <ul style="list-style-type: none"> <li>a. Retain an appropriate mix of retail units, taking particular note of the following: <ul style="list-style-type: none"> <li>i. Planning applications involving the loss of an A1 unit will not be supported unless the overall</li> </ul> </li> </ul>

	<p>percentage of A1 units remains above 50% following its loss.</p> <p>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.</p> <p>b. Retain and enhance the retail use of the frontages, taking particular note of the following:</p> <p>i. Conversion from shops to residential on these streets will not be permitted; and</p> <p>ii. Applications to convert ground floor residential units to A1 or A3 use will be supported*</p> <p>*With the exception of the purpose built housing such as New Cut Housing Coop and Styles House.</p>
<b>National policies and guidance</b>	
<b>NPPF</b>	<p><b>Relevant Paragraphs:</b></p> <p>23</p> <p>Paragraph 23 of the NPPF supports the protection of town centres, including through expecting planning policies to set out what uses are acceptable in these locations. P11 has regard to this expectation through setting out an expected minimum amount of key uses.</p>
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>Residential values are significantly higher than commercial values and therefore there is a market attractiveness towards changing the use of buildings to residential. However, a loss of retail units to housing is not necessarily to the benefit of the economic sustainability of a locality, as it leads to a loss of low-paid jobs and in the long-term reduces the attractiveness of an area to visitors, new businesses and new residents. This policy seeks to make a contribution to economic sustainability through intervening in the market in favour of the retention of retail units.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>This policy seeks to ensure the area retains an attractive and diverse retail offer, to the benefit of the local economy.</p>
<b>Social</b>	The contribution to social sustainability is broadly similar to economic development. A sufficient local retail offer is important



	<p>for those living in the area, particularly elderly and less mobile residents. The loss of retail units could result in the isolation of these residents.</p> <p>The minimum percentages for A1 and A3 use could prevent a proliferation of retail uses identified (including in the Mary Portas review) as negative to the high street and to public health. Potential uses falling outside of A1 and A3 include betting shops, payday lenders and fast-food takeaways.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>This policy makes a positive contribution as it seeks to provide a balanced range of retail uses that are beneficial to local people.</p>
<b>Environmental</b>	<p>This policy makes a negligible contribution to environmental sustainable development.</p> <p><b>Contribution to sustainable environmental development: o</b></p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 4.8 supports a successful, competitive and diverse retail sector in town centres. P13 supports these principles and adds specific detail related to the composition of units in the Lower Marsh/ The Cut retail area.</p>
<b>Lambeth Local Plan</b>	<p>Policy ED6 supports retail uses in town centres, seeking to maintain the predominant retail function of primary shopping areas in major and district centres and the Lower Marsh / The Cut Central Activities Zone frontage. P13 is in general conformity with this policy as it seeks to support retail uses in the local area.</p> <p>Policy ED7 supports food and drink uses subject to certain requirements and suggests that these should be primarily located in town centres and the Central Activities Zone. In seeking to secure at least 30% A3 use, P13 is in general conformity with that policy and upholds its general principle. It also does not contradict any of the criteria in ED7.</p> <p>Policy ED9 seeks to resist A2 uses where there is too much of a concentration of these uses. In supporting A1 and A3 uses, this policy is assisting Lambeth to meet its own target to restrict A2 uses to below 15% of all retail units in each shopping area.</p> <p>Policy H3 resists the loss of residential units except in certain criteria. To facilitate the introduction of retail units in a town centre/Central Activities Zone shopping area is not one of those reasons, so the Policy does add an extra level of detail to Policy</p>

	H3 in adding a third distinct exception of when the loss of residential uses may be acceptable. We consider that the Neighbourhood Plan is in conformity with the general principle of H3 (i.e. protecting existing residential uses), it adds detail by including a third exceptional circumstances. The rationale for doing so is to enhance the vitality of the Lower Marsh/The Cut shopping area as a retail (including food and drink) destination.
<b>Southwark Core Strategy</b>	<i>The part of the Neighbourhood Plan Area applicable to this policy is not within Southwark.</i>
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 14 (P14)</b>	
<b>Policy wording</b>	<p>The neighbourhood will encourage schemes which provide office or workspace in appropriate parts of the area with the following characteristics:</p> <ol style="list-style-type: none"> <li>a. Are able to be subdivided to encourage flexible use and co-working and / or</li> <li>b. Include a range of unit sizes including offices of under 1000 sq/m and / or</li> <li>c. Are able to provide accommodation for a range of jobs which are accessible to local people and / or</li> <li>d. Commit to working with third party employment support providers and local schools to provide work placements, apprenticeships and training support for unemployed people.</li> </ol>
<b>National policies and guidance</b>	
<b>NPPF</b>	<p><b>Relevant Paragraphs:</b> 23</p> <p>Paragraph 23 expects planning policy documents to proactively encourage office uses in town centre locations. P14 has regard to this policy through supporting office uses in the Central Activities Zone.</p>
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	

<p><b>Economic</b></p>	<p>The Neighbourhood Plan Area is part of the Central Activities Zone and therefore it is a sustainable location for offices in London, with high transport connectivity. The principle of encouraging the development of more office space in a range of different styles is a sustainable economic approach. The Lambeth Local Economic Assessment (2011) notes that the Borough has a relatively low business-base and that many residents commute out of the area for work. This policy will go some way to reducing that figure.</p> <p><b>Contribution to sustainable economic development: ++</b></p> <p>This policy seeks more sustainable economic development, which means that it makes a significant contribution in this regard.</p>
<p><b>Social</b></p>	<p>Through seeking to encourage more office space in a range of sizes and tenures, the Neighbourhood Plan is contributing to the employment of local people and opening up opportunities for small businesses to locate in the area. In particular, the requirement for a commitment to seeking to employ local people, including unemployed residents, makes a significant contribution to social sustainability.</p> <p><b>Contribution to sustainable social development: ++</b></p> <p>This policy makes various important contributions to sustainable social development.</p>
<p><b>Environmental</b></p>	<p>This policy makes a negligible contribution to environmental sustainable development.</p> <p><b>Contribution to sustainable environmental development: 0</b></p>
<p><b>Strategic Development Plan policies</b></p>	
<p><b>London Plan</b></p>	<p>Policy 4.2 seeks to meet the distinct needs of the central London office market by sustaining and developing stock in clusters of business space. P14 upholds the principle of this in encouraging office use and adds detail in specifying preferred types of offices in the neighbourhood plan area.</p> <p>Policy 4.12 seeks to improve employment opportunities for all Londoners and to remove barriers to employment. Parts C and D of P14 uphold this principle and add a framework for how this can be achieved in the neighbourhood plan area.</p>
<p><b>Lambeth Local Plan</b></p>	<p>Policy ED2 sets out a broad support for new B1 development, which includes offices. Parts (a) and (b) of P14 are in general</p>

	<p>conformity with this as they support office development, but add detail to this policy by in particular supporting proposals that include smaller units and support flexible work patterns.</p> <p>Policy ED14 seeks to maximise opportunities for employment of local people. Parts C and D are in general conformity with this and add an extra level of detail by expecting collaboration with local employment support providers and schools in order to enable employment of local people.</p>
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	<p>Strategic Policy 10 sets out support for a considerable amount of office floorspace development in the Central Activities Zone. It also seeks to target new jobs and training opportunities which arise from development towards local people. P14 upholds the principles of Policy 10 and adds detail in specifically supporting flexible office floorspace and smaller office spaces, which support local small and medium sizes businesses. It also adds detail with regards to the process through which businesses should seek to employ local people.</p>
<b>Summary</b>	
<p>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</p>	

<b>Policy 15 (P15)</b>	
<b>Policy wording</b>	<p>The neighbourhood will support proposals which enable physical infrastructure improvements to support the development and servicing of the street market at Lower Marsh, including:</p> <ul style="list-style-type: none"> <li>i. Electricity points</li> <li>ii. Storage</li> <li>iii. Refuse storage</li> <li>iv. Improved lighting</li> <li>v. Improved seating</li> <li>vi. Green Infrastructure</li> </ul>
<b>National policies and guidance</b>	
<b>NPPF</b>	<p>Paragraph 23 expects planning policy to retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and</p>

	competitive. P13 has regard to this policy in seeking to develop an important local market on Lower Marsh.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>The Lower Marsh Market makes an important contribution to the local economy and attracts visitors, as set out in the 2013 Lambeth Retail Needs Assessment. In order to continue to be successful, the market would benefit from modernisation. This policy supports the development of the market in order to secure its long-term financial sustainability, to the benefit of the wider area.</p> <p><b>Contribution to sustainable economic development: +</b></p> <p>This policy enhances the economic vitality of the neighbourhood plan area through supporting an important local retail feature.</p>
<b>Social</b>	<p>The 2013 Lambeth Retail Needs Assessment notes that Lower Marsh Market is a feature of the retail area, which is liked by local residents (evidenced in response to a household shopper survey). It employs local people and provides affordable goods. Therefore, its sustained existence, which this policy supports, is to the benefit of social sustainability.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>The market is liked by local residents and affordable. This policy in support of the market makes a contribution to sustainable social development.</p>
<b>Environmental</b>	<p>This policy includes criteria that seek to improve the built environment on Lower Marsh, including through improvements to street furniture, refuse storage and lighting. This would make the market more attractive, cleaner and less impactful on nearby properties.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>The policy supports an improvement to the built environment and therefore makes a contribution to environmental sustainability.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Policy 4.8 of the London Plan sets out strategic support for the improvement of markets in London. P15 upholds the principle of Policy 4.8 as it sets out specific improvements to the Lower Marsh

	market that would be supported, which are based on local context and needs.
<b>Lambeth Local Plan</b>	Policy ED13 supports maintenance of existing street markets in the Borough. P15 is in general conformity with Policy ED13 as it sets out principled support for improvements to the Lower Marsh street market. It adds an extra level of detail by specifying exact improvement opportunities, which are based on the actual needs of the market.
<b>Southwark Core Strategy</b>	<i>The part of the Neighbourhood Plan Area applicable to this policy is not within Southwark.</i>
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

- 7.1 The policies in this chapter have regard to the NPPF, support the principles of sustainable development and are in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policy in this chapter meets the Basic Conditions.

## 8 Social infrastructure and culture

- 8.1 This chapter contains Policies 16 and 17, which are addressed in turn.

<b>Policy 16 (P16)</b>	
<b>Policy wording</b>	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 re-provision of the community use within the new development or the Neighbourhood Plan Area.
<b>National policies and guidance</b>	
<b>NPPF</b>	<b>Relevant Paragraph:</b> 70 Paragraph 70 of the NPPF expects planning policies to guard against the unnecessary loss of valued facilities and services. P16 has regard to this in protecting a number of important community facilities.
<b>NPPG/ Written Ministerial</b>	N/A

<b>Statements (where applicable)</b>	
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>The policy seeks to retain the use of existing buildings in the neighbourhood plan area and therefore makes a negligible contribution to economic development. While other uses could be more valuable, a network of community infrastructure is an important feature of the local economy.</p> <p><b>Contribution to sustainable economic development: 0</b></p> <p>This policy should not have a detrimental impact on the local economy but equally it is unlikely to boost the economy. On that basis, its contribution is relatively negligible.</p>
<b>Social</b>	<p>The community facilities identified provide a crucial and varied local role, including two community centres, a pub and affordable artists' studios. These locations provide a support base for local people.</p> <p><b>Contribution to sustainable social development: ++</b></p> <p>The value of these uses is lower in monetary terms than other types of land use, but the social value is much higher than other uses. Therefore, in seeking to protect these locations from applications seek a change of use from a community use, the policy is making a significant contribution to sustainable social development.</p>
<b>Environmental</b>	<p>This policy has a limited environmental impact as it relates to the use of buildings.</p> <p><b>Contribution to sustainable economic development: 0</b></p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 3.16 sets out support for the retention of valued social infrastructure. P16 upholds the principle of this policy in seeking to protect a number of identified community premises of value in the neighbourhood plan area, which adds detail to the London Plan policy.</p>
<b>Lambeth Local Plan</b>	<p>Policy S1 supports the safeguarding of existing community premises of value. P16 is in general conformity with the principle of this policy, which is to protect valued community facilities. The Policy does represent a departure from S1 as it does not allow for the loss of these facilities in the circumstances set out in (b)(i) to b(iii) of Policy S1. This is considered necessary in the specific local context, where a number of important community facilities have</p>

	been lost and the facilities identified in accordance with P16 are particularly valued.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Policy 4 supports the provision of a network of community facilities that meet the needs of local communities. In seeking to protect particular community facilities identified as of value in the Neighbourhood Plan area, P16 upholds the principle of this policy and adds specific local detail.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 17 (P17)</b>	
<b>Policy wording</b>	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 uses will therefore be supported.
<b>National policies and guidance</b>	
<b>NPPF</b>	<b>Relevant Paragraph:</b> 23, 70  Paragraph 23 of the NPPF expects planning policies to promote the growth of town centres, pursuing policies that support their viability and vitality. This policy, in recognising the visitor draw of Leake Street, is seeking to expand the retail areas in the Neighbourhood Plan area to cluster around the attraction of Leake Street. This approach has regard to paragraph 23.  Paragraph 70 of the NPPF expects planning policies to plan positively for the provision of cultural facilities. P17 has regard to this in seeking to protect the graffiti art at Leake Street from harmful development.
<b>NPPG/ Written Ministerial Statements (where applicable)</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	By seeking to build on the success of a local visitor attraction, this policy makes an important contribution to economic sustainable development. New development in the uses identified would bring more employment to the Neighbourhood Plan area to the benefit of local residents.



	<p><b>Contribution to sustainable economic development: ++</b></p> <p>Through positively seeking to bring more retail use into a well-visited location in the Neighbourhood Plan area, this policy makes a significant contribution to its sustainable economic development.</p>
<b>Social</b>	<p>The protection of an important local cultural asset makes a contribution to sustainable economic development. It also encourages the more positive aspect of street art in a monitored environment, discouraging graffiti in other locations.</p> <p><b>Contribution to sustainable social development: +</b></p> <p>The policy protects a community asset to the benefit of sustainable social development</p>
<b>Environmental</b>	<p>The policy has limited environmental effects and therefore its contribution to environmental development is negligible.</p> <p><b>Contribution to sustainable environmental development: 0</b></p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 4.6 supports the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors. P17 upholds the general principle of this policy in seeking to support a valued cultural facility and bring economic benefits from its success.</p>
<b>Lambeth Local Plan</b>	<p>Policy ED11 supports the safeguarding of arts and cultural facilities in the borough to meet local and wider needs, particularly in the Waterloo London Plan Opportunity Area. P17 is in general conformity with this policy as it seeks to protect Leake Street as an artistic venue.</p> <p>Policy PN1 supports the development of the Waterloo Area as part of the Central Activities Zone. In supporting the growth of A1, A3, D1 and D2 uses in this area, the policy is in general conformity with the ambitions of PN1 while seeking to add a specific set of opportunities to help deliver its ambitions.</p>
<b>Southwark Core Strategy</b>	<p><i>The part of the Neighbourhood Plan Area applicable to this policy is not within Southwark.</i></p>
<b>Summary</b>	
<p>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</p>	

8.6 The policies in this chapter have regard to the NPPF, support the principles of sustainable development and are in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policy in this chapter meets the Basic Conditions.

## 9 Streetscape and transport

9.1 This chapter contains Policy 16, which is addressed below.

<b>Policy 18 (P18)</b>	
<b>Policy wording</b>	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.
<b>National policies and guidance</b>	
<b>NPPF</b>	Paragraph 69 expects new developments to contain clear and legible pedestrian routes and high quality public space, which encourage the active and continual use of public areas. P18 has regard to this statement in supporting the creation of legible streets, encouraging people to visit the neighbourhood plan area.
<b>NPPG/ Written Ministerial Statements</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	The creation of legible streets can encourage visitors to return to the area, which can be to the benefit of the local economy. However, the overall contribution of this policy to sustainable economic development may be quite minor and therefore a negligible mark is attributed.  <b>Contribution to sustainable economic development:</b> ○
<b>Social</b>	This policy will have a relatively negligible impact on social sustainable development in the area, although legible streets are important to support the wellbeing of local residents, including older residents and those with limited mobility.  <b>Contribution to sustainable social development:</b> ○
<b>Environmental</b>	Legible streets improve the sense of place of the built environment and make open spaces more enjoyable to those living in, visiting and working in the neighbourhood plan area. In addition, legible spaces may encourage people to choose to walk

	<p>between locations rather than choose less environmentally friendly forms of transport.</p> <p><b>Contribution to sustainable environmental development: +</b></p> <p>The implementation of this policy will help to create a neighbourhood plan area that is environmentally sustainable both in terms of the built environment but also through discouraging use of polluting forms of transport.</p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Policy 7.5 expects public spaces to be connected and easy to understand, utilising high quality design. P18 upholds the principle of this policy and adds detail in encouraging the use of the London Way Finding System as a means of delivering the intentions of Policy 7.5.
<b>Lambeth Local Plan</b>	Policies Q6, T2 and PN1 each support the promotion of walking through good urban design and improvements to legibility, particularly in the area in the case of PN1, and therefore this policy is in general conformity with the strategic policies of the Lambeth Local Plan. Through requiring design to use the Legible London Way Finding System as a means of achieving those policies, P18 is adding a specific local level of detail in the Neighbourhood Plan without undermining the ambitions of those policies. The rationale for doing so is based on the success of the Legible London approach in improving the legibility of areas in London.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Strategic Policy 2 supports development that encourages walking, reducing use of cars. Through seeking to implement the Legible London Way Finding System P18 upholds the principle of Strategic Policy 2 and adds a specific level of detail that will support its achievement.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

9.3 The policy in this chapter has regard to the NPPF, supports the principles of sustainable development and is in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policy in this chapter meets the Basic Conditions.

## 10 Planning gain and mitigation

10.1 This chapter contains Policies 19 and 20, which are addressed in turn.

<b>Policy 19 (P19)</b>	
<b>Policy wording</b>	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.
<b>National policies and guidance</b>	
<b>NPPF</b>	<p><b>Relevant paragraphs:</b> 204</p> <p>Paragraph 204 supports the use of planning obligations when they are necessary to make the development acceptable in planning terms, directly related to the development and are fairly and reasonably related in scale and kind to the development. P19 has regard to this statement in setting a reasonable expectation for mitigation for any impacts arising from new development that are not already covered by the community infrastructure levy.</p>
<b>NPPG/ Written Ministerial Statements</b>	N/A
<b>Principles of sustainable development</b>	
<b>Economic</b>	<p>This policy allows any negative impacts arising from new development to be paid for by the developer, rather than the local authority or other agencies. This is to the benefit of local people as it does not require resources to be directed away from other services or Council Tax/business rates to increase. This policy does not place an unfair burden on applicants as it only relates to direct impacts of new development and can work alongside the community infrastructure levy as a way to capture funds for mitigation measures. What costs are sought will also ultimately be at the discretion of the local planning authority.</p> <p><b>Contribution to sustainable economic development: +</b></p>
<b>Social</b>	<p>This policy ensures that any unforeseen negative social issues caused by new development are addressed where they are not already addressed by the community infrastructure levy. This makes a contribution towards sustainable social development.</p> <p><b>Contribution to sustainable social development: +</b></p>
<b>Environmental</b>	<p>The environmental contribution is similar to the social contribution, ensuring any negative environmental impacts of new developments that cannot be mitigated by the use of community infrastructure money are addressed.</p> <p><b>Contribution to sustainable environmental development: +</b></p>

<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	Policy 8.2 expects development plan documents to set a clear framework for how negotiations on planning obligations will be approached. P19 upholds the principle of this policy and adds detail as it sets out how it will seek to gather the necessary ongoing infrastructure costs arising from new development.
<b>Lambeth Local Plan</b>	Policy D4 seeks to ensure that development proposals provide or fund local improvements to mitigate the impact of the development and/or additional facilities and requirements made necessary by the development, including local public realm improvements including streetscape, local public open space, play facilities and community safety. P19 is in general conformity with this policy as it is essentially seeking the same provision, however, the addition of "ongoing" in this Policy supports Lambeth to seek money towards ongoing costs arising from a new development, drawing together the expectations of Policy D4 with another Lambeth Local Plan Policy, ED11(a), which relates specifically to major leisure/visitor development and not all forms of development. Applying this approach to all forms of development constitutes an additional level of detail and exists to protect the Business Improvement District or Council from bearing ongoing costs related to new developments. This Policy is worded in such a way that it can be effective alongside revenue captured from the Community Infrastructure Levy. The supporting rationale identifies the London Eye method as effective, which could be used as a template for future agreements while noting the existence of CIL as an additional means of capturing revenue at the outset.
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	Strategic Policy 14 supports the use of planning obligations to reduce or mitigate the impact of developments. P19 upholds the principle of Strategic Policy 14 and adds a specific level of local detail to how the Section 106 aspect of obligations should be addressed.
<b>Summary</b>	
The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.	

<b>Policy 20 (P20)</b>	
<b>Policy wording</b>	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 that support the development of the Neighbourhood Plan Area.

National policies and guidance	
NPPF	<p><b>Relevant paragraphs:</b> 175</p>
	<p>Paragraph 175 states that CIL should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised with the neighbourhoods where development takes place. P20 has regard to this statement in seeking to fund a number of projects that would have an important local benefit.</p>
NPPG/ Written Ministerial Statements	<p><b>Relevant Paragraphs:</b> Paragraph: 073 Reference ID: 25-073-20140612 Paragraph: 078 Reference ID: 25-078-20140612</p>
	<p>Paragraph: 073 Reference ID: 25-073-20140612 makes the following key points (emphasis added where important):</p> <ul style="list-style-type: none"> <li>• Communities without a parish, town or community council will still benefit from the 15% neighbourhood portion (or 25% portion, if a neighbourhood plan or neighbourhood development order has been made);</li> <li>• If there is no parish, town or community council, the charging authority will retain the levy receipts but should engage with the communities where development has taken place and agree with them how best to spend the neighbourhood funding;</li> <li>• <b>The use of neighbourhood funds should match priorities expressed by local communities, including priorities set out formally in neighbourhood plans;</b></li> </ul> <p>Paragraph: 078 Reference ID: 25-078-20140612 states that: <i>The neighbourhood portion of the levy can be spent on a wider range of things than the rest of the levy, provided that it meets the requirement to 'support the development of the area'.</i> It further states that this can include the delivery of affordable housing.</p> <p>P20 has regard to these key statements in formally setting out a list of infrastructure priorities in the Neighbourhood Plan, which each support the development of the area.</p>
Principles of sustainable development	
<p><b>Economic</b> <b>Social</b> <b>Environmental</b></p>	<p>The impact for these three dimensions are broadly similar in that the range of projects identified bring a broadly similar benefit in terms of the local economy, social network and the local environment. While the relevant local authorities would have spent CIL money on projects, this process ensures local people</p>

	<p>have a say on which projects should be prioritised through the Neighbourhood Plan.</p> <p><b>Contribution to sustainable development: +</b></p>
<b>Strategic Development Plan policies</b>	
<b>London Plan</b>	<p>Policy 8.3 states that the Mayor will work with Government and other stakeholders to ensure the effective development and implementation of CIL. P20 is in general conformity with this policy as it acknowledges the intention of the Mayor's office and applies to the neighbourhood element of CIL.</p>
<b>Lambeth Local Plan</b>	<p>Policy D3 states that the council, where required and necessary, will co-produce local neighbourhood infrastructure delivery plans that identify, prioritise and cost projects to be delivered locally via agencies working in co-operation with the council or by the council itself. Projects will be brought forward as appropriate and relevant in mitigating the direct impact of development through section 106 planning obligations or the council will retain funds on behalf of the community to deliver local neighbourhood facilities and improvements through the use of a neighbourhood funding element of CIL.</p> <p>P20 upholds the general principle of this policy, which is to deliver the neighbourhood element of CIL, but it sets out an alternative approach through which this should be done. This approach is justified in Planning Practice Guidance (as set out above) as the priorities in the neighbourhood plan, which will ultimately be voted on by local people, are related to the development of the area.</p>
<b>Southwark Core Strategy and saved Southwark Plan Policies</b>	<p>The Development Plan Documents were adopted prior to the introduction of CIL, but Policy 14 supports the use of planning obligations to reduce or mitigate the impact of developments. In addition, Page 119 includes a fact box that details how CIL should be used to fund the infrastructure needs of development, allowing new development to be made sustainable by the provision of parks and other green spaces. As with the explanation for the Lambeth Planning Policies, P20 is in general conformity with the principle of these aspects of the development plan but add a local level of detail in the context of Planning Practice Guidance.</p>
<b>Summary</b>	
<p>The Policy has regard to national policy and guidance, contributes to the principles of sustainable development and is in general conformity with the strategic policies of the Development Plan. On that basis, it meets the basic conditions.</p>	

- 10.7 The policies in this chapter have regard to the NPPF, support the principles of sustainable development and are in general conformity with the relevant strategic policies of the Development Plan. Therefore, it is considered that the policy in this chapter meets the Basic Conditions.