

Our reference: CSL114

2 November 2021

London Borough of Lambeth

Via Email – planning@lambeth.gov.uk

FAO: Ben Oates

Dear Ben,

THE LONDON TELEVISION CENTRE 60 - 72 UPPER GROUND LONDON SE1 9LT

APPLICATION REFERENCE: 21/02668/EIAFUL

We write on behalf of our clients Coin Street Community Builders (CSCB), freehold owners of Prince's Wharf / Gabriel's Wharf, Mulberry, Iroko, Palm and Redwood housing cooperatives, Coin Street neighbourhood centre and the Doon Street development site, and leasehold owners of Bernie Spain Gardens and of the Riverside Walkway from the National Theatre to Oxo Tower Wharf. A number of these sites are seriously impacted by the above planning application, and we wish to strongly object to it.

You will be aware that the NPPF 2021 contains the following guidance:

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

130. Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*



- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

132. Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

Having regard to the above, the applicant's proposals do not take account of the views of the community, which opposes the application in vigorous terms, and have not reconciled commercial and local interests. The proposals:

- are not sympathetic to the built environment, setting and heritage assets;
- do not create an attractive place for workers, residents or visitors;
- do not result in a high standard of amenity for future users; and
- undermine quality of life, community cohesion and resilience.

The reasons for the objection are as below.

Scale, Bulk and Siting

The scale, bulk and siting of the proposed development is excessive, overbearing and overly dominant. The site is prominently located on the South Bank, visible from adjoining bridges, from the Victoria Embankment and areas further to the north of the River Thames. The site forms a vital piece of townscape in London and is positioned in an area of high cultural importance. It is paramount that the redevelopment achieves the objective of delivering the highest quality scheme possible. To do so all aspects of the new buildings must be acceptable, without compromise. The building must stand the test of time and comply with all adopted policy objectives. Regrettably, these high-quality standards have not been achieved in the scheme as proposed.

The volume of the proposed development would create a domineering bulk and massing which would be overbearing for the size of the site. The proportions of the two towers, both individually and when combined, together with the extent of site coverage are excessive and should be reduced in order to achieve a satisfactory outcome. As presently proposed, the planning application fails to satisfy Lambeth Local Plan Policy Q2 Amenity i. by unacceptably compromising visual amenity from adjoining sites and from the public realm and Policy Q7 Urban design: new development ii. which identifies the importance of bulk, scale/mass, siting, to adequately preserve or enhance the prevailing local character.

The proposed development would greatly exceed the proportions of existing buildings, with the effect of dominating its surrounds. The submission documents demonstrate that the proposal would dominate the context of this prominent location. The proposal adversely impacts on the setting of the surrounding townscape, causing harm to the setting, character and appearance of both the South Bank conservation area and adjoining grade II listed IBM Building, and dominating the adjoining Prince's Wharf /Gabriel's Wharf. The proposed height, scale, massing and siting does not satisfactorily consider the relationship with the future redevelopment of the adjoining Princes Wharf/Gabriel Wharf. The proposal fails in the requirement to be sensitive to the surrounding context and fails to improve the quality of the built form and public realm.



Lambeth Local Plan Policy Q24 River Thames applies, and the proposed development fails to satisfy its requirements. As currently proposed, for the reasons explained above, the application scheme fails *A i. to enhance the character of the river frontage, views from the river and from the opposite bank; ii. preserve the setting and approaches of the Thames bridges; iii. maintain and create publicly accessible spaces / routes along the river for a continuous riverside walkway.*

Lambeth Local Plan Policy Q26 Tall Buildings, supported by Annex 10, identifies the southern part of the site, 'Location 10', as being suitable for a tall building.

Policy Q26 defines tall buildings to be over 45m at this location. The northern element of the proposed development fronting onto Queens Walk, (60.1m) would be categorised as a tall building, along within the southern element (109.4m), to form two towers. It should be noted that 'Location 10' for provision of a tall building does not include the northern part of the site, separated from the southern part of the site by Protected View 8A.1 from Westminster Pier to St Paul's Cathedral. Therefore, criteria within Q26 A applies to the southern tower and Q26B applies to the northern tower.

As a consequence of the scale, bulk and siting of the proposed buildings, the 109.4m tower would fail policy Q26A's criteria i. adverse impact on local views; ii. design excellence; iii. townscape; iv. principles of group composition such as noticeable stepping down in height around cluster edges.

Policy Q26 B states "*Outside the locations identified in Annex 10 or as identified in site allocations, there is no presumption in favour of tall building development.*"

Lambeth Local Plan allocation **Site 9 - Design principles and key development considerations** does not repeat Annex 10 but rather states "*Any proposal for tall buildings on the site will need to be sensitive to the surrounding context and seek to improve the current arrangement/design to improve both the quality of the built form and public realm.*"

Policy Q26 B continues: "*Should tall buildings be proposed outside the locations identified in Annex 10 or as identified in site allocations, the applicant will be required to provide a clear and convincing justification and demonstrate the appropriateness of the site for a tall building having regard to the impact on heritage assets, the form, proportion, composition, scale and character of the immediate buildings and the character of the local area (including urban grain and public realm/landscape features) and ensure points (a) (i) - (vi) are met.*" The 60.1m tower would, for reasons specified above, also fail policy Q26A criteria i. adverse impact on local views;. ii. design excellence; iii. townscape; iv. principles of group composition such as noticeable stepping down in height around cluster edges.

The 60.1m tower is outside the location identified for a tall building. That is not to say a tall building at this location is not acceptable, but that the policy requirements must be addressed so that any development that comes forward must be to the highest quality standard.

It is acknowledged that the Council granted ITV planning permission for some tall buildings as part of their new studio development in May 2018 (but not as tall or as bulky as those now proposed). That consent was made personal to ITV having regard to the retention of a unique user within the borough and '*the synergies that occur through being co-located in the Cultural Quarter, delivering significant economic and cultural benefits not just for this part of London, but for the city as a whole*' (officer report to committee). The proposed development does not retain ITV and bring such synergies. The ITV consent has in any case lapsed and is no longer extant.



The current application needs to be judged against current new policy context, and a proper planning balance needs to be applied to these proposals.

Impacts arising from scale and bulk

As a consequence of the excessive scale and bulk, harm is identified to differing degrees on surrounding heritage assets. These are namely the South Bank conservation area, IBM Building (grade II listed), the Royal National Theatre (II*), Pride Sculpture (II), Somerset House (I) and Royal Festival Hall (I).

We will leave it to others to consider and make representations on the impacts on the listed buildings mentioned above. CSCB wishes to focus on the impact on the South Bank Conservation Area of which its estate forms a large part. The degree of harm caused to the setting of the South Bank Conservation Area would be substantial and the public benefits given are not considered to be of a level to justify the harm. Thus, the test in paragraph 200 of NPPF has not been met.

The planning application documentation refers to pre-application comments from Historic England and the Greater London Authority supporting the proposals, of the possible degrees of harm to heritage assets and to public benefits. However, their actual written correspondence is not immediately evident following a search of the submission documents although the GLA Stage 1 report does identify that less than substantial harm will be caused by the proposal and that they *consider the proposal could deliver substantial public benefits*.

It is contended within the planning application documentation that any 'less than substantial harm' is outweighed by public benefits. We strongly disagree that the 'public' benefits listed within the application are sufficient to justify the scale of the proposed development and the harm it will cause on the Conservation Area as a consequence.

The scale, bulk and massing of the proposed development would not preserve or enhance the character or appearance of the South Bank Conservation Area or its setting, contrary to Policy Q22 Conservation Areas.

As a consequence of the excessive massing and bulk identified, the application fails to respect the character of the river frontage and surrounding views, contrary to Lambeth Local Plan Policy PN1: Waterloo and South Bank criterion H v.

These policies could be met by reducing the massing and bulk of the proposed development. The matter of public benefits is dealt with below.

Public Benefits

We question the value of the public benefits listed being sufficient to accept the harm caused by the proposed development which would be substantial at this prominent site due to the proposal's scale and permanence.



We do not agree that the provision of new employment space in the CAZ, including affordable workspace, is of sufficient *public* benefit given the extent of existing employment space within Central London when considered against the scale of harm to heritage assets. The NPPF requires the harm caused to heritage assets to be balanced against *public* benefits. We have concluded that the claimed 'public' benefits are primarily private benefits for occupants of the building, and much of the harm is to existing public realm, existing heritage assets, and existing adjacent residential properties.

That harm would be reduced by limiting the excessive bulk and massing of the building. A building of *reduced scale and massing* could still achieve the public benefits identified, such as opening up the frontage to Queen's Walk and the circulation routes to the east and west of the proposed development. These are seen as prerequisites to achieve a good development and capable of being delivered by a less substantial building than that currently proposed.

The extent of public benefits would be more credible if the development supported improvements in line with *community priorities* such as improving and extending existing green infrastructure. This would somewhat mitigate the impact of the proposed development, particularly the increased use of the riverside walkway and Bernie Spain Gardens that will inevitably result. Such offsets would be tangible, accessible and meet the needs of a wider proportion of society than the so-called 'public' benefits identified within the planning application.

Residential impacts - daylight

The impacts on daylight received by adjacent CSCB housing co-operatives, especially Iroko, will be severe. The application fails to meet Policy Q2 Amenity iv. as the proposals would have an unacceptable impact on levels of daylight and sunlight on adjoining property. We have commissioned a technical report which will be submitted when finalised.

Overshadowing of Public Realm

The Applicant's Environmental Statement Vol. 1 section 8 Daylight, sunlight, overshadowing and light pollution identifies that increased overshadowing of Bernie Spain Gardens and The Queen's Walk Gardens will occur. Irrespective of the advisory targets within BRE Guidelines for sunlight and daylight, harm will be caused as a consequence of the proposed development. This will be to the detriment of those places as being both public open spaces and being within the public realm, enjoyed by the public as incidental and recreational areas. The application is supported by claims as to the extent of wider public benefits, but such impacts on the public realm would completely undermine those *perceived* public benefits. As presently proposed, the application fails to protect and maintain open space as required by A. of Policy EN1: Open space, green infrastructure and biodiversity Policy Q2 Amenity iv. as it would have an unacceptable impact on levels of sunlight on adjoining outdoor spaces.

The slides taken from the applicant's own material, show very significant overshadowing: (1 & 2) on 21 March, Queen's Walk to the north of the proposed development *currently* enjoys sunshine throughout the lunchtime peak but would be cast into shadow by the proposed development; (3 & 4) by 3pm the development is still overshadowing a large part of the riverside walkway, including the popular observation platform. It is now also overshadowing a substantial area of Bernie Spain Gardens north park; (5 & 6) by 5pm the proposed development casts *all* of Bernie Spain Gardens north park into shadow. These are key times for local workers, for local residents and for visitors. The same overshadowing impacts will be felt in September, albeit an hour later due to BST. (The 12 noon March overshadowing impact shown in the applicant's material is similar to the 1pm slide annexed to this letter).



Even at the height of summer, 21 June, the proposed development casts into shadow areas of the riverside and Bernie Spain Gardens that currently enjoy sunshine: (7 & 8) there is *currently* virtually no overshadowing of the Queen's Walk at 1pm but the proposed development will cast a shadow over a significant part of the riverside, including the benches and flowerbeds of the consented Queen's Walk Gardens; and (9 & 10) by 6pm the development casts most of Bernie Spain Gardens south park into shadow. The impacts will not just be felt by people but by trees and plants. In the winter, when trees have lost their leaves and sunshine is most valued by those using the riverside walkway and gardens, the shadows cast by the proposed development will be longer than any of the annexed slides.

In conclusion, instead of improving nearby public realm, the proposals significantly harm these spaces. This is not just a local issue: the South Bank riverside walkway is currently one of *the most visited areas of London*. The wanton disregard of one of London's most popular amenities is unacceptable and short-sighted.

New Public Realm and Access Routes

The supporting text to Lambeth Local Plan Policy Q6 Urban design: public realm identifies that "*High-quality design is key to delivering sustainable development: it creates successful places, encourages civic pride and can discourage crime. It raises the quality of our environment. The council is committed to securing high-quality design and construction across the borough, especially in opportunity areas*".

Lambeth Local Plan allocation 'Site 9 ITV Centre and Gabriel's Wharf, Upper Ground SE' states "The council will support development that: iii. improves pedestrian linkages between Upper Ground and Queen's Walk."

Provision of a new public route is made to the east boundary with Prince's Wharf/Gabriel's Wharf, however, due to its location and configuration its attractiveness will be compromised. The route would be narrow on its south approach to Upper Ground and subject to a 'pinch-point' which would obscure the river setting. It is located adjacent to the proposed service bay, with a dead frontage of solid wall against its southern entrance.

For the above reasons the proposed development fails to satisfy the criteria of Lambeth Local Plan allocation 'Site 9 ITV Centre and Gabriel's Wharf, Upper Ground SE1, and specifically the following criteria: iii. pedestrian linkages between Upper Ground and Queen's Walk; v. reflects the transitional role of Gabriel's Wharf between Bernie Spain Gardens and the river and avoids significant overshadowing of Bernie Spain Gardens;

Claimed public benefits

The applicant claims that, under its proposals, 40% of the site would become 'public realm'. CSCB believes that this overextends the definition of new 'public realm' and exaggerates the benefits being offered. Most of the proposed 'public' realm is in any event necessary for access, circulation and escape within the development and for its setting. The main new internal SW-NE route passes under the centre of the building, is not therefore open to the sky, and would presumably be closed at night (or if not would be unsafe at night). Other sections are to serve retail frontages. Many of the green benefits are offered on spaces only accessible to occupiers of the building. Access arrangements for the top floor of the riverside tall building are not clear.



The 'new' public realm cannot be claimed as a proportionate or satisfactory mitigation of the impact of the scale of the building, the increased occupancy, and the resultant pressure on Bernie Spain Gardens, in particular, that will arise as a consequence.

CSCB is particularly concerned about the interface between the retail element of the development on the riverside and the consented Queen's Walk Gardens. The latter were designed and approved on the principle that they would provide a relaxed space with colourful planting and extensive seating as an escape from the busiest part of the riverside walkway. The application is silent on how its retail proposals will safeguard the aims of this consented scheme.

Impact on Prince's Wharf/Gabriel's Wharf

The proposed development's siting, scale, mass and bulk is excessive with consequential adverse impacts on Prince's Wharf/Gabriel's Wharf. For the reasons detailed above, the proposed development fails to satisfy the criteria of Lambeth Local Plan allocation 'Site 9 ITV Centre and Gabriel's Wharf, Upper Ground SE'.

Furthermore, the proposal is contrary to Policy Q7 Urban design: new development, criteria x. which requires that new proposals "*do not prejudice the optimum future development of, or access to, adjoining plots by ... avoiding unacceptable overshadowing or undue sense of enclosure.*"

It is noted that a detailed daylight and sunlight assessment of future receptors has been scoped out of the Environmental Statement Vol. 1 section 8 Daylight, sunlight, overshadowing and light pollution, as it is claimed no significant effects are anticipated (8.4.6). Prince's Wharf/Gabriel's Wharf adjoins the application site immediately to the east and paragraphs 8.7.41 – 8.7.43 identify that the proposed development would lead to overshadowing at each of the tested dates. Prince's Wharf/Gabriel's Wharf forms part of the Lambeth Local Plan site allocation – Site 9 and, accordingly, the Council must consider the prospect of such impacts upon that future site.

Conclusions

Coin Street Community Builders strongly objects to planning application ref. 21/02668/EIAFUL for the following reasons:

- The scale, bulk and siting of the proposed development is excessive, overbearing and overly dominant.
- The proposal would not preserve or enhance the character or appearance of the South Bank Conservation Area or its setting.
- It is contended within the planning application documentation that any 'less than substantial harm' is outweighed by public benefits. We strongly disagree that the public benefits listed within the application are sufficient to justify the scale of the proposed development and the harm it will cause on the Conservation Area.
- The impacts on daylight received by adjacent CSCB housing co-operatives, especially Iroko, will be severe.
- Instead of improving nearby public realm, the proposals significantly harm these spaces. This is not just a local issue: the South Bank riverside walkway is currently one of *the most visited areas of London*. The wanton disregard of one of London's most popular amenities is unacceptable and short-sighted.



- The new public route running north south through the proposed development (to the east boundary with Prince's Wharf/Gabriel's Wharf) is not acceptable in its form. It is narrow on its south approach to Upper Ground and subject to a 'pinch-point' which would obscure the river setting. It is also located adjacent to the proposed service bay, with a dead frontage of solid wall against its southern entrance.
- The proposed development's siting and excessive scale, mass and bulk will have adverse consequential adverse impacts on Prince's Wharf/Gabriel's Wharf.

In our opening comments in this letter, we referred to the proposals not meeting paragraphs 126, 130 and 132 of the NPPF. Above, we have referred to many instances where the proposals do not meet the policies of the newly adopted Lambeth Local Plan.

The applicant's proposals do not take account of the views of the community, which opposes the application in vigorous terms, and have not reconciled commercial and local interests. The proposals:

- are not sympathetic to the built environment, setting and heritage assets;
- do not create an attractive place for workers, residents or visitors;
- do not result in a high standard of amenity for future users; and
- undermine quality of life, community cohesion and resilience.

The proposals do not accord with an up-to-date development plan, the proposals create harm that is not outweighed by public benefits, and CSCB and the local community are vigorously against them.

Yours sincerely



Paula Carney
Director
CarneySweeney

Enc.



Our reference: CSL114

2 November 2021

London Borough of Lambeth

Via Email – planning@lambeth.gov.uk

Dear Sir/Madam,

THE LONDON TELEVISION CENTRE, 60 - 72 UPPER GROUND, LONDON, SE1 9LT

APPLICATION REFERENCE: 21/02668/EIAFUL

REPRESENTATIONS BY COIN STREET COMMUNITY BUILDERS (CSCB) CONCERNING PRIORITIES FOR THE S106 AGREEMENT RELATING TO THE ABOVE APPLICATION.

1. CSCB has made representations strongly objecting to the above proposed development, on the following grounds:

- The scale, bulk and siting of the proposed development is excessive, overbearing and overly dominant.
- The proposal would not preserve or enhance the character or appearance of the South Bank Conservation Area or its setting.
- It is contended within the planning application documentation that any 'less than substantial harm' is outweighed by public benefits. We strongly disagree that the 'public' benefits listed within the application are sufficient to justify the scale of the proposed development and the harm it will cause the Conservation Area.
- The impacts on daylight received by adjacent CSCB housing co-operatives, especially Iroko, will be severe.
- Instead of improving nearby green open spaces, the proposals cause significant harm through their overbearing nature and through much increased overshadowing of the riverside walkway, especially the site of the consented Queen's Walk Gardens, and of Bernie Spain Gardens.

These objections are also being expressed by many other local stakeholders, both directly and via SoWN (the authors of the statutory South Bank & Waterloo neighbourhood plan), and by local residents.

2. If, despite the extent of local objections to the scheme, the Council is nevertheless minded to approve the proposed development, CSCB asks that very serious and detailed consideration is given to what is needed in the detail to make the development acceptable in planning terms in relation to its very substantial local impacts. Legislation requires that planning obligations must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.



We contend that because of these very substantial local impacts any s106 agreement must give far more priority to mitigation in the immediate physical vicinity of the development than has been the case with other recent major applications in South Bank and Waterloo. For example, the s106 agreements for Elizabeth House and the IBM site have given overwhelming priority to affordable workspace and employment and skills with very little money left for local green infrastructure and immediate local mitigation, the latter of which clearly meets all the bullet point tests above.

3. We appreciate that the Council has policies in relation to affordable workspace and employment and skills, but we are not aware of any requirement that these elements be given priority over immediate 'local improvements to mitigate the impact of the development' (Local Plan Policy D4). We also base this submission on our understanding of the three pillars of Council policy on these matters, as set out to SOWN by Cllr Matthew Bennett at a recent meeting: affordable workspace, employment and skills, and the climate emergency (*our emphasis*). The need to address the latter suggests to us that the creation and improvement of green infrastructure, within the parameters of s106 guidance, should thus be the absolute priority of any s106 agreement from this enormous development. The approach to the s106 agreement being sought in these representations is well supported in Policy D4 of the adopted Local Plan, which identifies, alongside other priorities:

- ii. local public realm improvements including streetscape, local public open space, play facilities and community safety;
- xix. green infrastructure;
- xxi. other sustainability measures, including mitigation of impacts on and/or enhancement of biodiversity and wildlife habitats.

4. Two important CSCB projects, the re-landscaping of Bernie Spain Gardens north park, and the creation of Queen's Walk Gardens, both of which have received planning approval from Lambeth, closely match these headings i.e item ii - local public open space, item xix - green infrastructure, and item xxi - enhancement of biodiversity and wildlife habitats.

Please note that we are using the NPPF definition of green infrastructure here:

Green infrastructure: *A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.*

4. CSCB is an active member of SoWN and has been encouraged by reports of the recent productive discussions between SoWN and the Council about priorities expressed in the updated SoWN projects list. As the Council is aware, this includes the two public open green space projects referred to above: the consented improvements to Bernie Spain Gardens north and the new Queen's Walk Gardens. CSCB was particularly encouraged by the references to these two projects in a Lambeth presentation to a meeting between Cllr Mathew Bennett, senior officers and SoWN representatives on 29 April this year. On slide 5 of the LBL presentation to that meeting, in response to the project headings for these two green open space projects, the Council's responses (*in italics*) were

Improvements to Bernie Spain Gardens north: *ITV s106 to be "pooled" for general open space contribution and then allocation made through conversation with SoWN as revenue/ capital contribution to deliver.*

Queen's Walk Gardens: *Interface with IBM & ITV schemes.*

Both SoWN and CSCB made strong representations concerning the low priority given to mitigation in the form of green open space contributions in the s106 for the IBM site consent. We understand that prioritising such improvements in the 72 Upper Ground s106 agreement would receive strong support from SoWN also.

5. We are aware that the proposed new 'cultural facilities' included in the 72 Upper Ground proposals are supported by the Council but would like to make the following points in relation to this particular development.



- a) the local objections to this development primarily relate to scale, bulk, and daylight and sunlight impacts. We understand that the cultural (i.e. affordable workspace) component of the development amounts to 11% of the total space. We believe that the affordable workspace component of the development, *which the s106 agreement is required to make acceptable in planning terms*, is actually adding 11% to the bulk and volume - which is the essence of many objections and most requires mitigation.
- b) the affordable workspace policy and the value of the discounts calculated from it are based on the space being used in this way for only 15 years. The green open space and biodiversity benefits of the open space improvements CSCB wishes to see prioritised are permanent - as are the climate, community, public health, and amenity benefits they will deliver.
- c) we disagree that the public realm within the development and its greening will meet the necessary obligations for mitigation. CSCB's case is that most of the new 'public' realm provided is in any case necessary for the functioning of the development, and most of the upper areas to be greened will be accessible only to occupiers of the development. This is fully set out in CSCB's main objections to the proposal. There is no doubt, even with the terrace provision, that most occupiers and visitors to the proposed development will also use local green spaces. The ground floor commercial outlets will also draw to the riverside walkway and Bernie Spain Gardens new visitors who will not have access to the terraces.
- d) where developments have the effect of intensifying usage of local green spaces, this normally regarded as a case for s106 *revenue* support in line with Local Plan policies EN1 and ED13B. However, as the Council will be aware, CSCB currently funds the management and maintenance of the riverside walkway and Bernie Spain Gardens and is committed to continuing to do so after the improvements to Bernie Spain Gardens north and Queen's Walk Gardens (for which the Council has granted consent) have been made. The need for *capital* improvements is both to deliver improved quality and biodiversity, and to provide a more resilient infrastructure to withstand the increased usage caused by neighbouring developments and densification permitted by Lambeth and Southwark Councils. *Capital* contributions to these spaces will have a more lasting impact than time-limited *revenue* contributions. Such capital investments are fully supported in para 9.10 of the Local Plan in areas of open space deficiency.
- e) In the recently published GLA green infrastructure map data <https://apps.london.gov.uk/green-infrastructure/> the vicinity of this development is already in *the highest category of need* in relation to access to public open space. Even if the cultural facilities proposed are of a different nature than provided by existing South Bank cultural organisations, it cannot be argued that there is any shortage of cultural facilities in this local neighbourhood.

6. CSCB was pleased to note in the recent (5 July 2021) Lambeth Cabinet Report on CIL and S106 the following references:

Para 1.1 'the S106 based contributions which provide capital funding to fund the local impacts of development'. It is these kinds of contributions which are necessary to make increased floorspace on this site acceptable in planning terms. Such contributions used to be a very strong feature in earlier s106 agreements for major developments in South Bank and Waterloo. CSCB believes that this previous approach urgently needs to be reinstated in any agreement to allow densification at 72 Upper Ground.

Para 2.4 and table 12 refer to the results of the Council's survey of residents in Bishop's Ward. This identified three main priorities for planning gain: young people; employment and skills; and Parks, Open Space & Air Quality.



Para 2.13 (a) states:

S106 negotiations - Planning officers will become more aware of the specific needs of local areas that will be impacted by new development. This will help identify more targeted mitigation measures that may be needed to address the impact of new development on local areas...

Note: this has not so far led to any kind of local engagement by planning officers with CSCB or SOWN on the priorities for the 72 Upper Ground s106.

7. CSCB asks that the case set out above is given serious consideration in the negotiation of the s106 agreement for 72 Upper Ground, and that it should be taken fully into account by planning officers negotiating this agreement, in the spirit of para 2.13(a) of the 5 July Cabinet paper above. It hopes that this will lead to priority being given to local public open green space improvements to mitigate the very severe local impacts of any intensification of uses at 72 Upper Ground.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P Carney', with a large, elegant flourish extending from the end of the signature.

Paula Carney
Director
CarneySweeney



21st March

1pm Existing



Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st March

1pm Proposed



Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st March

3pm Existing

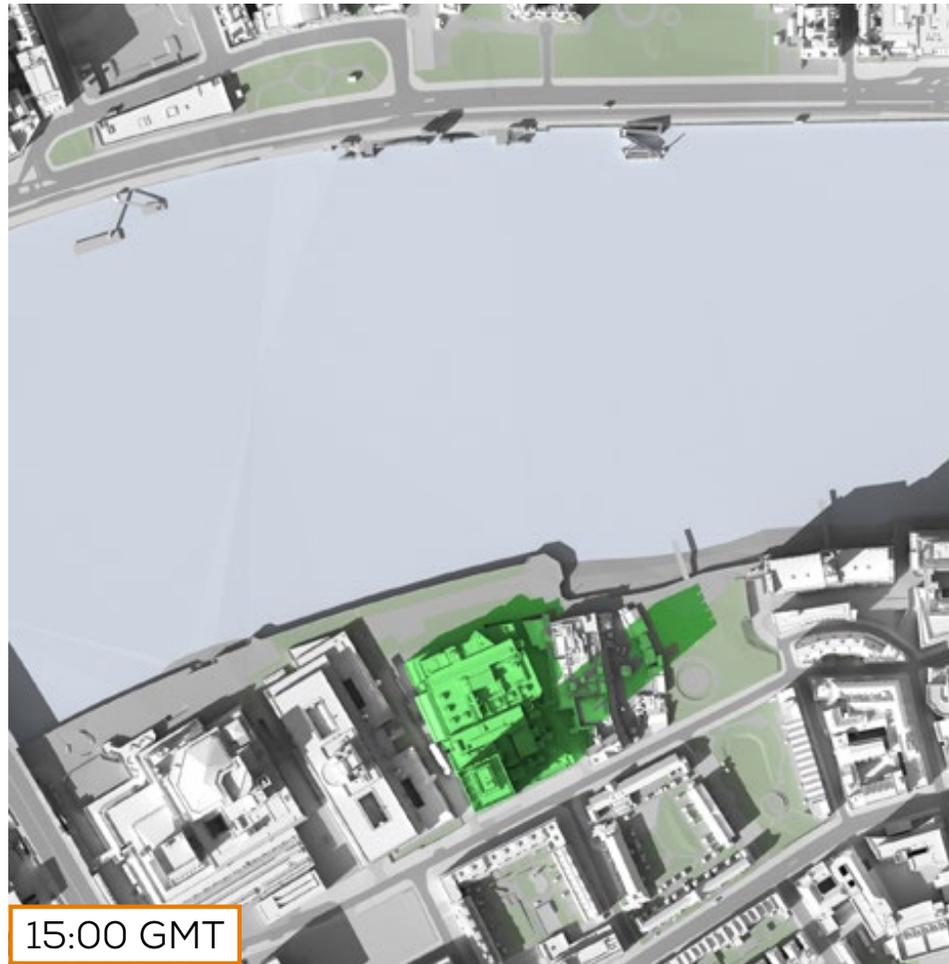


Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st March

3pm Proposed

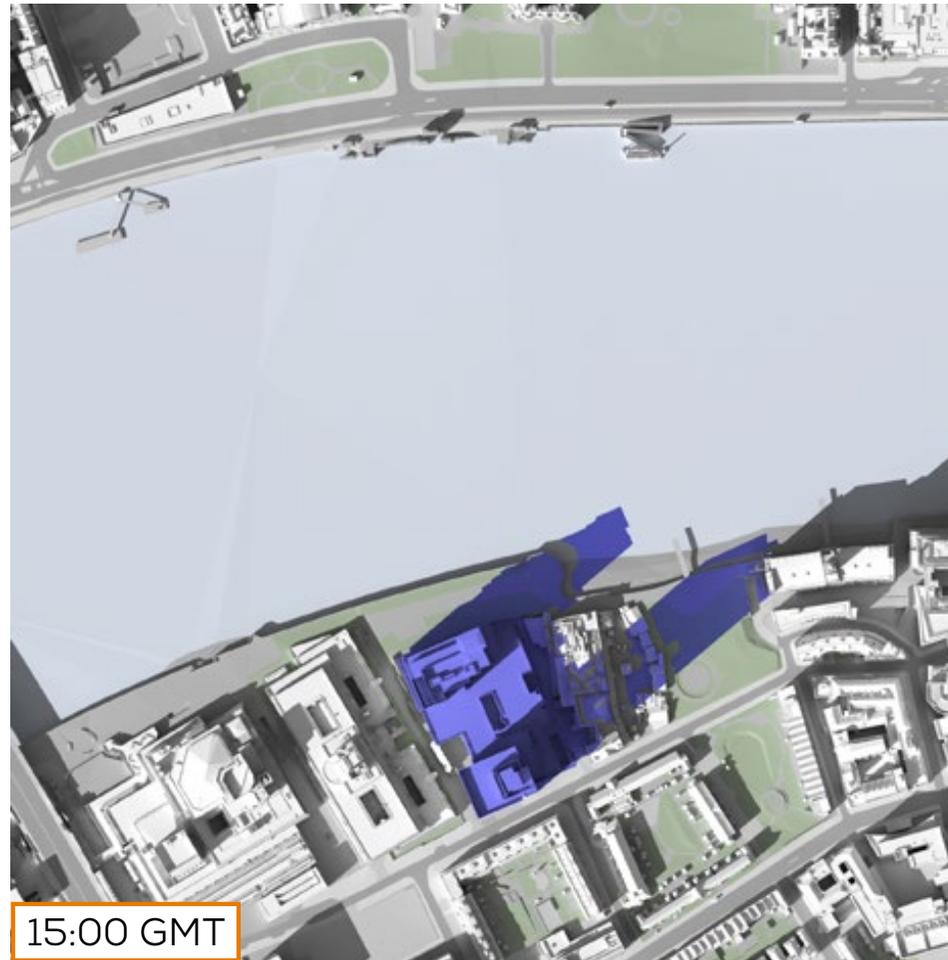
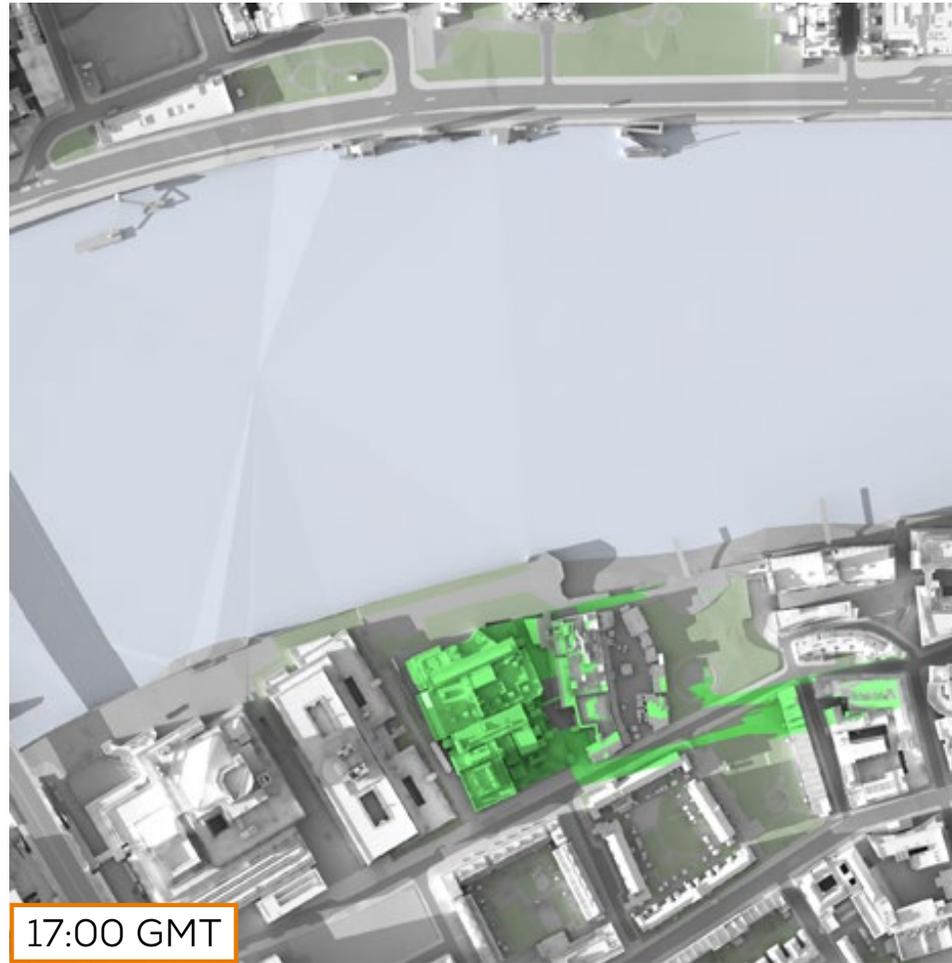


Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st March

5pm Existing



17:00 GMT

Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st March

5pm Proposed



Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st June

1pm Existing



Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st June

1pm Proposed



Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st June

6pm Existing



18:00 BST

Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021

21st June

6pm Proposed



Image extracted from 72 Upper Ground submission - Environmental Statement - July 2021