

Tuesday 22nd March 2016

Dear Jack Hopkins,

We are writing to you in respect of the delegated decision regarding the Proposed changes to the lease held by Coin St. Community Builders relating to land on the South Bank.

In respect of Recommendation 1 we have to recommend that there is

- no variation of lease/ Deed of Variation
- no delegation of authorities to allow this to proceed
- this document should not be approved
- any decision should be made by full council

We would wish to make a number of points relative to points raised in the report and that relate particularly to section 3.8 of the 1992 Lease with London Residuary Body to Coin Street Community Builders.

[Lambeth as the local authority with responsibility to properly consult and listen](#)

[Report 5.1](#)

1. Lambeth have a responsibility to consult and actively listen in respect of the open space which is the grassed area on the Queens Walk.

1.1 Given there has been no consultation on the variation in this lease: with its consequential devastation of an important open space that will affect the enjoyment of walking along the Queen's Walk with its seriously negative effect on the health and well being of Londoners.

1.3 This is an environmental issue and therefore the Aarhus Convention is of significance.

"The United Nations Economic Commission for Europe (UNECE) [Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters](#) (pdf ~50K) was adopted on 25 June 1998 in the Danish city of Aarhus (Århus) at the Fourth Ministerial Conference as part of the "Environment for Europe" process. It entered into force on 30 October 2001. (For recent up-dates and the follow-up process please have a look at the [UNECE Convention website](#)). It was ratified in the UK on 23.02.05.

The Aarhus Convention establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective. The Convention provides for:

- the right of everyone to receive environmental information that is held by public authorities ("**access to environmental information**"). This can include information on the state of the environment, but also on policies or measures taken, or on the state of human health and safety where this can be affected by the state of the environment. Applicants are entitled to obtain this information within one month of the request and without having to say why they require it. In addition, public authorities are obliged, under the Convention, to actively disseminate environmental information in their possession;

- the right to participate in environmental decision-making. Arrangements are to be made by public authorities to enable the public affected and environmental non-governmental organisations to comment on, for example, proposals for projects affecting the environment, or plans and programmes relating to the environment, these comments to be taken into due account in decision-making, and information to be provided on the final decisions and the reasons for it ("**public participation in environmental decision-making**");
- the right to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general ("**access to justice**"). " (European Commission Doc.)

2. Job Development 1.5

2.1 There is no evidence to prove any significant job creation.

2.2 This, our local area, is of metropolitan and indeed of national significance and its importance and has long been recognised. With the developments that are both in development and discussion stage within the area, such as all that is going on under and above ground at Waterloo Station there is much room for a robust job development programme. There is much room for grounding some work in heritage work given the number of tourists visiting the area and increasingly staying in hotels in the area.

2.3 This is an area with a rich and diverse social history to be celebrated. Upper Ground has developed into the narrow street of today because it is the old Narrow Wall which people walked along by the rural Thames, who were followed by people seeking the freshness of the river air as the city developed and industrialised.

2.4 It really has to be emphasised that this open space on the South Bank is critical in order to absorb raised numbers of visitors that this area already has and is to expect, leaving aside the building of this proposed bridge.

2.5 The Garden Bridge and the South Landing Building are not going to achieve this. We need to move forward but we have to learn from history and the experience of others. The statement that the garden bridge build 'would bring jobs to the area' is hollow, patronizing and disingenuous.

2.6 If the bridge is built (delivered by outside contractors of course and the maintenance would be delivered this way too) then what jobs would be on offer?

2.7 Any gardening will also be contracted out.

2.8 There might be a handful of retail jobs selling bridge souvenirs and refreshments but that's about it. These would be minimum wage with no career path whatsoever.

2.9 Volunteering does not count....very few people can afford to volunteer anymore and like internships this is used for employers to get free labour.

3. Health and Wellbeing 4.3

3.1 The general health our local community is severely threatened by the proposal to change the lease on this land. A wider local community with both a high level of medical conditions and disability as well as a need to support their good health and well being who need this open space. The concerns raised by a visually impaired resident of the Oxo Tower draw attention of the detrimental affect to her own life and ability to future use of Queens Walk. We know from responses at the February PAC that neither the Garden Bridge Trust nor Planning Officers have a real awareness of material needs in the designing an environment for differently abled usage.

3.2 There was no evidence in the reports presented for conditions agreement to suggest that the Garden Bridge was dealing efficiently with equality issues. We would suggest that a new EqIA is essential.

3.3 This open space is an integral part of the riverside walk, view and open space as it has developed. Working with neighbouring Southwark, the Association of Waterloo Groups and the GLC this is what Lambeth committed to, alongside much needed housing, in this development partnership.

3.4 Lots of people visit the riverside walk because they need the space with its trees and shrubs for the whole well being of their person from this and neighbouring boroughs: like the man who comes up from the Old Kent Road to walk his dog every day.

3.5 More locally it provides, as it was always intended to through many post second world war redevelopment plans an open space for the many residents of Waterloo, including the Peabody Estates, Tanswell Estate and other housing estates who have no green open space, who desperately need that space and the trees because of the limitations of their living conditions and the pollution of city centre living.

3.6 Visitors to this area of the Southbank with very young families have nowhere safe and quiet for their young children to play. They are jostled by crowds and children have to be kept on tight stressful 'reins' for their own safety.

3.7 A 2001 proposal of a Toddlers Playground with wonderful open views of the river and sky would have been a wonderful thing for all involved and a progressive concept of a non-intrusive nature.

3.8 A Toddlers Play area was to be designated and designed for the green space on the Queens Walk and money set aside by CSCB. This playground would have been a much-needed asset of community value and a safe haven for young children and their carers. There are 3 nurseries in the area (2 at either end of Cornwall Road and 1 in the Coin Street Centre itself) *none* of these have access to *open* (trees, grass, sky, views etc) child-safe

space. Each have just a very small asphalt area nestled by very polluted streets with noisy heavy traffic.

3.7 The change of this lease as proposed is a profound and detrimental loss that will not be replicated by the bridge or south landing building and indeed this is a major loss that cannot be mitigated.

4. Open Space Planning Context 1992 Lease 3.8

4.1 Even when the Waterloo Bridge was being planned in the 1920s they were looking to the need for open space on the south bank between Waterloo and Blackfriars Bridge.

4.2 The industrial landscape may have changed in that time but the need for open space on this stretch of the river still holds. London is a city of constant change and innovation but there is a timeless spirit and history which attracts and speaks to workers, tourists and residents alike.

4.3 **The Royal Fine Arts Commission** (forerunner of CABE) in 1926 was saying of the new proposed Waterloo Bridge: "In this case, however, consideration of a special nature must be given " the river frontage must be developed so as to enhance the greatest environmental asset of the Capital city - the river-and this enhancement must incorporate the completion of the new river wall and riverside walk and public open space between Waterloo and Blackfriars Bridges." be taken into account. The new bridge cannot be treated in isolation....."

4.4 **Association of Waterloo Groups /Proof of Evidence (1981)**

.....the scheme restates two of the best qualities of London's riverside: a strong feeling of visual horizontality combined with spaciousness in the midst of the city.....

The Coin Street river frontage forms a potential point of transition between the wide promenade (Queens Walk) fronting the South Bank Arts complex and the narrow paved walkway fronting the Kings Reach development. (Dr John Richard Parker)

4.5 Even now London planning is derived from The London Plan 1943

4.6 There is the welcome of the sweep of the river with its swathe of trees, taking our eyes to Somerset House, Waterloo Bridge or St.Pauls - either way the sweep of the river at this juncture allows for the important enjoyment and well being of millions.

4.7 The open space is an integral part of the riverside walk, view and open space as it has developed. Working with neighbouring Southwark, the Association of Waterloo Groups and the GLC this is what Lambeth committed to, alongside much needed housing, in this development partnership that created this distinctive stretch of the current riverside walk for people to enjoy.

4.8 The construction of the bridge and the south landing building will have significant and negative impact on this view as experienced.

4.9 There is a profound and detrimental loss of a number of trees on this site that cannot be replicated on the bridge.

We request again that you seriously consider again the consequences of allowing a variation of the lease.

Yours sincerely