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To: [Local Plan](#)
Cc: [Catherine Carpenter](#)
Subject: Local Plan consultation Main Modification MM87 Hotels in Waterloo
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Dear Lambeth Plan team

I am writing on behalf of Waterloo Community Development Group to object to **Main Modification MM87 regarding hotel development in Waterloo.**

Waterloo Community Development Group (WCDG) is a registered charity and company limited by guarantee; we have been the local resident's planning group since 1972, and have been involved in multiple iterations of the District Plan, UDP, Core Strategy and Local Plan since then, as well as the London Plan and numerous SPD/ SPGs. We hold regular public meetings where developers consult on their development proposals, as well as development of planning policy. We commented at all of the previous stages of the Plan and participated in the Examination by the Inspector.

Lambeth proposed a moratorium on hotels in Waterloo which we very strongly support, but the Inspector does not agree and has required that they change this, although I have seen no detailed reasons in the form of an Inspector's Report. Lambeth are obliged to propose a modification and consult on it. They propose reverting to the current position in the existing Lambeth Plan (new visitor accommodation should go in central London (Central Activities Zone or CAZ) in Waterloo and Vauxhall).

Waterloo has had an exponential growth in hotels over the past 25 years, from none (before the Marriot in County Hall in the mid-90s to 17 today) and it has been accelerating, with developers speculating on virtually any site in the area, causing unrealistic expectations in real estate, which inevitably piles pressure on local planning authorities with limited resources to bat such proposals off. And we have lost a lot of sites which could have been housing, including affordable housing, which we so desperately need. The character of the area is already becoming dominated by visitor accommodation use to the detriment of other uses and their balance, which in Waterloo is complicated and under intense development pressure. Our high street (Lower Marsh and The Cut) has lost lots of useful shops which residents and the 60,000 office workers used, replaced by a huge number of food and drink outlets catering to visitors - the entire south side of The Cut being a case in point, for example, which used to have a utensils and equipment shop, a bike shop, and a hardware store, all gone in recent years to food and drink. Many major sites have been lost to hotels which once had offices or was available for housing. Lambeth has actually under-counted the number of hotels which have been developed in recent years – please see table below. Furthermore, that part of Waterloo covered by the LB Southwark (which is economically and socially as one with the Lambeth part) has also seen a ballooning of hotels, again to the detriment of the character of the area – please see the second table below.

Apart from all of the arguments already made by LAMBETH and by ourselves as to why there should be a moratorium – because we have more than met the amount expected to be developed in Waterloo to 2041 and already risk losing the balance of land uses – I briefly wish to engage with the arguments pointed at by the Inspector:

- The London Plan notes that "***the CAZ contains housing, social infrastructure and community uses to address the needs of residents, visitors and workers***. Whilst they are not strategic functions of the CAZ, ***these locally orientated uses play an important role in the character and function of the Zone as a vibrant mixed-use area, ensuring activity and vitality at different times of the day and week*** (2.4.6) ... The quality and character of ***the CAZ's predominantly residential neighbourhoods should be conserved and enhanced***. This should ensure a variety of housing suitable to the needs of diverse communities, including affordable housing, whilst ensuring that development does not compromise strategic CAZ functions." (2.4.19)
- Large parts of the South Bank are residential, with over 2,000 households between York Rd/Stamford St and the Thames; away from the South Bank and Waterloo Station, and aside from the CAZ retail frontage (Lower Marsh & The Cut), most areas are mainly if not wholly residential
- With 22 major visitor attractions and a great river frontage, the South Bank already attracts over 25 million visitors a year, and supports a burgeoning food and drink industry. The bulk of this has arrived in the past 20 years and has had significant impacts from which the local residential community needs some protection e.g. the retail offer has changed significantly from useful convenience and comparison to the domination of food and drink, reducing the sustainability of the residential community
- London Plan policy E10 does support a moratorium: section K requires "the quality and character of predominantly residential neighbourhoods, where more local uses predominate, should be conserved and enhanced."; section F requires a balance of local land uses be maintained and local amenity protected. In the circumstances of Waterloo, where the balance is clearly under significant threat, additional visitor accommodation would use up sites otherwise available for housing or offices, and would threaten to tip the balance and reduce the capacity to maintain a sustainable community.
- The purpose of a moratorium in Waterloo is not to stop additional visitor accommodation in the borough, but to encourage its development elsewhere other than Waterloo
- Without a moratorium on hotels in Waterloo, economic opportunities will continue to be wasted as developers leave sites empty in the hope of achieving a hotel permission; and it will create enormous strain on the local community and the local planning authority to treat each application on its merits and subject it to various planning tests
- NPPF Para 81 says "each area should build on its strengths" - which is its clear mixed use in central London - "and counter any weaknesses" - the biggest weakness is

speculative developers leaving sites vacant for decades whilst speculating on uses

- the Waterloo hotels in Southwark (2,475 beds) need to be taken into account in this calculation/ consideration, not merely the 3,869 beds in Lambeth part of Waterloo
- we currently have two hotel developments on site, three live applications for hotels, and one in major development in pre-app consultation - the absence of a moratorium will mean each of these will have to be dealt with exhaustively on a case by case basis, presenting the same evidence to be tested by each developer, and can and will only add to the unhelpful development pressures in Waterloo

Waterloo hotels in Lambeth

Days Hotel London, Waterloo 54 Kennington Road, SE1 7BJ	162
Hampton by Hilton 157 Waterloo Road, SE1 8US	297
Horse and Groom 122-124 Westminster Bridge Road, SE1 7RW	6
Park Plaza Former County Hall Island Block, Westminster Bridge Road	1037
Marriott Hotel County Hall, Belvedere Road, SE1 7PB	206
Novotel London, Waterloo 113-127 Lambeth Road, SE1 7TS	187
Park Plaza County Hall 1 Addington Street, SE1	398
Premier Inn (Former Lying in Hospital) 79 York Road, SE1 7NJ	234
Premier Inn Belvedere Road, County Hall, SE1 7GQ	314
Point A Hotel 118-120 Westminster Bridge Road, SE1 7XE	94
Park Plaza Waterloo 6 Hercules Road, SE1 7DU	492
Marlin Waterloo 111 Westminster Bridge Road	234
137-139 Lower Marsh	36
Nox 22-25 Lower Marsh	40
Ruby Lucy 98-108 Lower Marsh	79
<i>Ruby Lucy extension 97-98 Lower Marsh (application)</i>	53
TOTAL	3,869

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Waterloo hotels in Southwark

Saint George's House, 195 - 203 Waterloo Rd	284
H2 284-302 Waterloo Rd	177
46-49 Blackfriars Rd	479
Sea Containers House, 20 Upper Ground	358
1-16 Blackfriars Rd	163
Wedge House, 32-40 Blackfriars Rd	192
18 BLACKFRIARS ROAD (construction underway)	548

FORMER LESOCO CAMPUS, UFFORD STREET (complete?)	274
TOTAL	2,475

Please reinstate the proposed moratorium for hotels in Waterloo

Michael Ball

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