

**REF: WT/JD/R00369**

Planning Policy Team  
London Borough of Lambeth  
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Winchester  
SO23 5DG

**BY EMAIL ONLY:** localplan@lambeth.gov.uk

29 March 2021

Dear Sir / Madam,

**DRAFT REVISED LAMBETH LOCAL PLAN  
ROK PLANNING ON BEHALF OF WATERLOO HUB HOTEL LIMITED (R049)  
REPRESENTATION IN RESPONSE TO PROPOSED MAIN MODIFICATIONS TO THE DRAFT  
REVISED LAMBETH LOCAL PLAN**

I write on behalf of our client, Waterloo Hub Hotel Limited ('WHHL'), to submit representations in respect of proposed main modifications ('MM') made to the Draft Revised Lambeth Local Plan Document ('DRLLP').

These representations address the Main Modifications (MMs) which the Inspector considers are necessary for the soundness of the Plan, and in particular, Ref no. MF 12, MF13/ MM87, MM88 raised in document SD17b – 1 schedule of potential changes updated 4 December 2020, with Inspector Response January 2021.

WHHL have submitted representations previously in respect of the Regulation 19 pre-submission document dated 13 March 2020 and submitted a statement and participated in the hearings in November 2020 where have objected to Draft Local Plan Policy ED14 (Hotels and other visitor accommodation).

**Main Modifications**

WHHL continue to strongly object to proposals within the Council's draft policy to restrict delivery of new build additional hotel accommodation, particularly and including on existing hotel sites in the Waterloo Central Activities Zone.

Overall and as set out above and in past representations, draft Policy ED14 does not contribute to the long-term sustainability and vitality of the hotel sector. It does not provide the flexibility for introducing added value to existing hotel sites (particularly in the scenario of a change of economic circumstances over the plan period) and will stifle and restrict the development of hotels in the Waterloo CAZ.

As such WHHL strongly endorse the Inspector's suggested modification which would amend draft clause (c) of Policy ED14 to allow additional visitor accommodation (C1) in Waterloo within the boundary of the Central Activities Zone CAZ) where it does not cause unacceptable harm to local amenity or the balance and mix of local land uses.

The leading role of the CAZ is its function as a strategic commercial area. Therefore, commercial and employment generating uses including hotels should be acceptable in principle, which is the current approach with the London Plan CAZ policy. Waterloo is home to one of the largest rail networks and is a prime location for new hotels where there is sustained demand for hotel accommodation from tourists visiting London.

A moratorium improperly restricts the development of hotels in the borough when there is no London wide set target. As the Inspector sets out, London Plan Policy E10 section F encourages enhancement of visitor infrastructure in the CAZ and OAs, subject to safeguarding local amenity and balance of local land uses. The London Plan therefore does not support a moratorium on additional visitor accommodation in Waterloo within the CAZ boundary. The National Planning Policy Framework ('NPPF'), especially paras 80 and 81, also apply.

A moratorium on permitting hotel development in the Waterloo area therefore **would fail** the tests of soundness in national policy, as set out in NPPF35, and be contrary to the provisions of the London Plan.

Whilst also failing against the strategic objectives of the NPPF and London Plan, the policy similarly is not based on the depth and understanding of all the site-specific circumstances of hotel sites in the borough.

WHHL similarly endorse the Inspector's view that new hotel proposals outside of town centres should be assessed against the sequential test.

### **Concluding Remarks**

The policy has not been positively prepared and is not consistent with the key economic thrusts of the NPPF. Due regard has not been given to all the varied site-specific circumstances of the hotel sites in the Waterloo CAZ and outside town centres to enable an appropriate policy to be drafted.

WHHL would continue to draw the Inspector's attention to their previous submissions for greater detail on the hotel market and demand as presented in their regulation 19 representation dated 13 March 2020 and their hearing statement dated 9 October 2020, including input from Colliers International.

We trust this representation will be considered as part of the consultation. If you should have any questions in the meantime please do not hesitate to contact Will Thompson on 07921 067 012 or (will.thompson@rokplanning.co.uk), or myself at this office.

Yours faithfully,



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cc:

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