

**Draft Revised Lambeth Local Plan – Proposed  
Submission Version January 2020**

**Topic Paper 5: Visitor accommodation**

**May 2020**

  
**Lambeth**

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## Executive Summary

London is the second most visited city in the world, with 31.5 million overnight visitors (domestic and international) in 2015. Lambeth is home to many top visitor attractions including the London Eye, the Southbank Centre, National Theatre, London Dungeons and London Aquarium as well as newer tourist destinations like Brixton. The visitor economy brings many economic benefits, as does visitor accommodation. Lambeth welcomes these forms of development. However, as with all development, impacts must be mitigated and development management is required to ensure an appropriate mix of land uses, that benefits are secured for local people and that these are spread across the borough.

There has been a recent increase in the amount of visitor accommodation coming forward in the borough, probably partly due to Lambeth's proximity to nationally renowned cultural attractions such as those within the Southbank, and partly because of the increasing popularity of local attractions within the borough, such as Brixton.

The Draft London Plan estimates that London will need an additional 58,000 bedrooms of serviced visitor accommodation between 2015 and 2041. This is not a target and the Draft London Plan also does not set borough-level targets. The evidence underpinning this latest London-wide projection suggests Lambeth would need to see a net increase in supply of 3,368 rooms between 2015 and 2041, which equates to 5.2% of the London-wide figure.

It is important for Lambeth to contribute to London's need for visitor accommodation. As demonstrated in section 3 of this topic paper, Lambeth has been performing strongly in delivering net additional serviced visitor accommodation since 2015.

As of December 2019, less than one fifth of the way through the 25 year period from 2015 to 2041, 35 per cent of the projected 3,368 additional serviced rooms required in Lambeth had already been completed. Once all of the serviced rooms currently under construction are completed, this will increase to 45 per cent. If all the additional consented pipeline of serviced rooms in Lambeth is built out, this will increase to 99 per cent. In short, there is a very strong pipeline of serviced visitor accommodation in Lambeth and no shortage of supply to meet anticipated demand.

This performance has resulted in a marked concentration of new hotels and serviced rooms in some parts of the borough, particularly in Waterloo and Vauxhall. The proposed policy approach going forward (draft policy ED14) is to promote new visitor accommodation in other town centres in the centre and south of the borough to spread the benefits of the visitor economy to those areas, whilst managing existing concentrations of visitor accommodation and ensuring other much needed land uses can be delivered in these locations, particularly housing, offices and workspace. The draft policy also seeks to ensure that the impacts of visitor accommodation on local areas are appropriately mitigated. Draft Policy ED14 has been prepared to be consistent with national policy and in general conformity with the Draft London Plan Intend to Publish version (December 2019).

## 1. Introduction

- 1.1. This topic paper explains the rationale behind the proposed policy approach for hotels and visitor accommodation (Policy ED14) in the DRLLP PSV 2020. It sets out:
  - an overview of the national and regional policy context
  - a summary of the evidence base to both the London Plan and the Local Plan including the record of delivery of visitor accommodation in Lambeth
  - a justification for the proposed policy approach
  - a summary of the Issues and Draft Revised Lambeth Local Plan consultation feedback on hotels and visitor accommodation
- 1.2. The policy applies to visitor accommodation in the C1 Use Class and includes serviced visitor accommodation such as hotels, B&Bs, apart-hotels, guesthouses and hostels used for visitor accommodation such as youth hostels.

## 2. Policy context

- 2.1. Draft Policy ED14 has been prepared to be consistent with national policy and in general conformity with the Draft London Plan Intend to Publish version (December 2019). This section summarises the national and regional policy context.

### National Planning Policy Framework 2019

- 2.2. Paragraph 80 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 2.3. The glossary of the NPPF includes hotels within the definition of ‘main town-centre use’. Paragraph 86 of the NPPF states local planning authorities should apply a sequential test to planning applications for main town centres uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

### London Plan

- 2.4. Draft London Plan Intend to Publish Version December 2019 policy on serviced visitor accommodation is set out in policy E10 Visitor Accommodation. The relevant sections of the policy state the following:
- C A sufficient supply and range of serviced accommodation for business visitors should be maintained.
  - D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.
  - E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set

out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.

- G To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:
- 1) 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; OR
  - 2) 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice.
- 2.5. The supporting paragraphs to Draft London Plan policy E10 set out that concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses or erode the mixed-use character of an area should be avoided. It encourages boroughs in outer and inner London beyond the CAZ to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism.
- 2.6. Strategically important serviced accommodation is defined as being more than 20,000 sqm. No definition of ‘smaller scale’ is provided.
- 2.7. It should be noted that unlike policy 4.5 of the previous London Plan, policy E10 of the Draft London Plan does not set a target for new hotel rooms. However, paragraph 6.10.2 states that it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms across the capital per annum. It adds that in addition to leisure visitors the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres.

### **3. Evidence base on visitor accommodation demand and supply in Lambeth**

#### GLA Working Paper 88 – Projections of demand and supply for visitor accommodation in London to 2050 (2017)

- 3.1. In April 2017, the GLA published Working Paper 88 – Projections of demand and supply for visitor accommodation in London to 2050. The working paper forms part of the evidence base for the Draft London Plan and contains new data on demand for and supply of serviced visitor accommodation (traditional hotels, B&Bs, guest houses and hostels are considered as ‘serviced accommodation’, where services such as catering and cleaning are provided to guests) in London. It includes an estimate of the net additional number of rooms expected to be needed in London between 2015 and 2041.
- 3.2. The paper finds that the existing supply of serviced accommodation across London is concentrated within central London, with 76.6 per cent of all serviced accommodation located in central London boroughs. According to Working Paper 88, as of 2015, 2.9% of London’s serviced accommodation rooms were located in Lambeth. Between 2011 and 2015, Lambeth added 766 net rooms to London’s supply, which equated to 4 per cent of the total increase across the capital and the 10th highest increase amongst all London Boroughs.
- 3.3. The working paper projects that, based on demand, London will need to add an additional 58,140 rooms to the serviced accommodation supply between 2015 and 2041, at an average of 2,236 per annum. This is based on an anticipated increase in visitor nights from 138.4 million in 2015 to 196.4 million by 2041.
- 3.4. In terms of distribution of demand across boroughs, Lambeth is projected to require a net increase of 3,051 rooms between 2015 and 2041, which equates to 5.2% of all growth across London. In relation to supply, Lambeth is projected to need to contribute 3,368 additional rooms between 2015 and 2041. It should be noted however that this is not a target or an apportionment and is simply a projection. No borough-level figures are referenced in the Draft London Plan.
- 3.5. The working paper also acknowledges the growing impact of non-serviced accommodation (such as Airbnb) in meeting demand in the capital. It acknowledges that there is an increase in demand from visitors looking to have different and more local experiences whilst visiting a location, combined with the increased supply of non-serviced accommodation. It states that the growth of services such as Airbnb can lead to the following potential assertion: that for a proportion of tourists, non-serviced accommodation is substituting previous demand for hotels and for some visitors there may be a

complete substitution from hotels to non-serviced accommodation. However, the paper acknowledges that it is not certain whether consumer preferences for tourism will shift, therefore the modelling in the paper has not been adjusted to account for recent growth in non-serviced accommodation.

## Hotels and other Visitor Accommodation in Lambeth 2020

- 3.6. The council monitors the number and distribution of hotels and other types of visitor accommodation in the borough annually. The most recent information is published in 'Hotels and Other Visitor Accommodation in Lambeth 2018/2019' pipeline report, which is up to date as of March 2019. This topic paper provides an interim update on schemes permitted in 2019/20. A further update will be provided in the Hotels and Other Visitor Accommodation in Lambeth 2019/2020 once information on starts and completions during 2019/20 is available.
- 3.7. Table 1 below sets out Lambeth's delivery of net additional hotel rooms since April 2015 against the GLA projected supply of 3,368 additional rooms between 2015 and 2041. This includes the net additional serviced rooms completed in Lambeth between April 2015 and March 2019, those currently under construction and the pipeline of additional serviced accommodation approved or the subject of a planning application at March 2020.

*Table 1: Net additional hotel rooms in Lambeth since April 2015 (completions and planning pipeline)*

	Net additional rooms	Percentage of GLA projected supply 2015 – 2041 (cumulative)
Net additional serviced rooms completed in Lambeth between April 2015 and March 2019	1190	35 per cent
Rooms under construction at March 2019	316	45 per cent
Net additional rooms through unimplemented planning consents at March 2020	1,020	75 per cent
Net additional rooms through planning permissions granted subject to s106 between April 2019 and March 2020	800	99 per cent

Source: Lambeth Hotels and Other Visitor Accommodation Pipeline 2018/19 and data in Appendix 2 of this topic paper

- 3.8. Table 1 demonstrates that as of December 2019, four and a half years (18 per cent) through a 25 year period for the delivery of net additional serviced

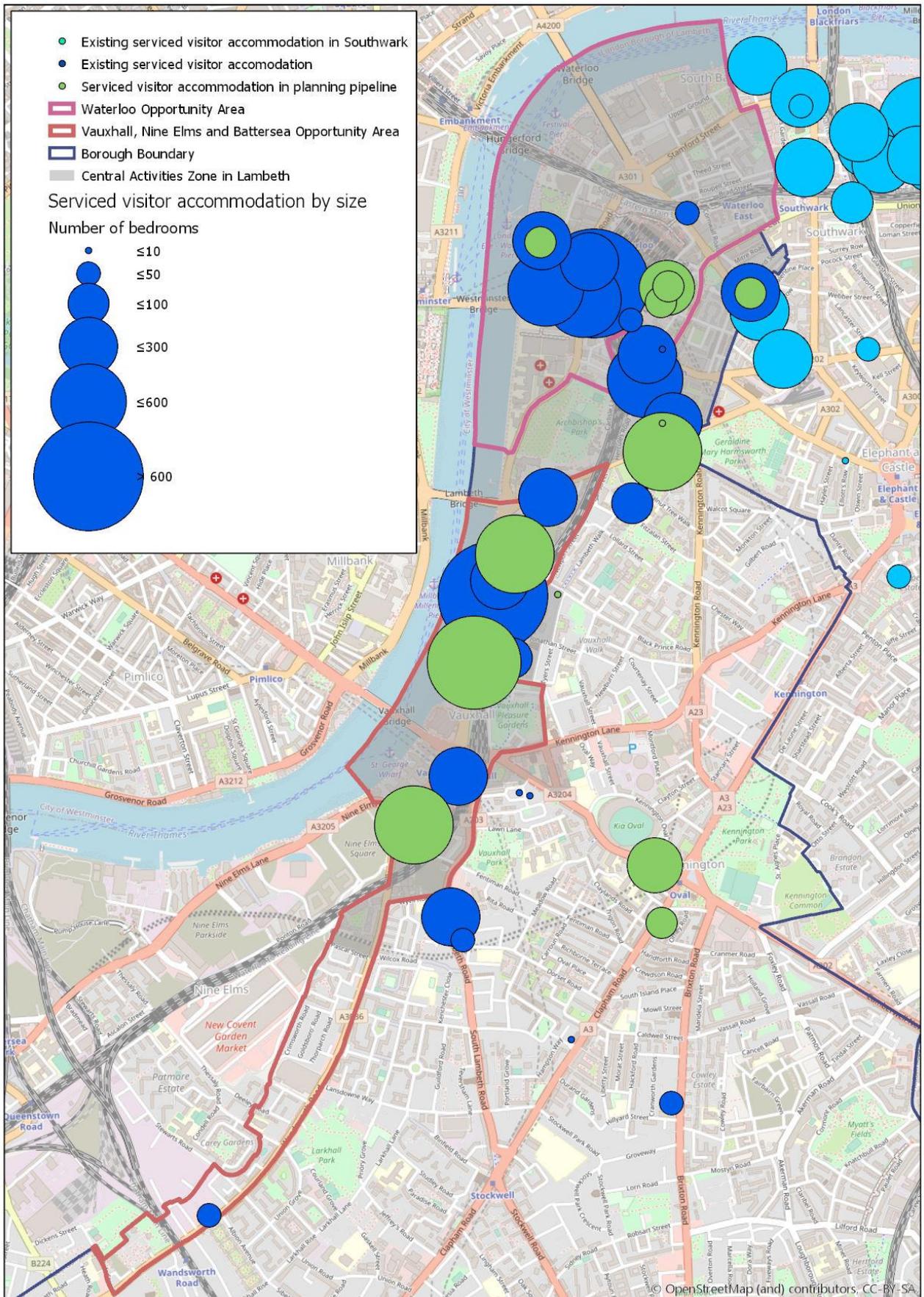
rooms, 35 per cent of the GLA’s projected net additions of supply up to 2041 have already been completed in Lambeth. This will increase to 45 per cent once rooms currently under construction are completed and 75 per cent if all current unimplemented planning consents are built out. The number of rooms granted permission subject to s106 during the financial year 2019/20 is 800. Should all of these rooms be built out, 99 per cent of the GLA’s projected net additions of supply up to 2041 will be delivered.

- 3.9. This record of delivery and development pipeline demonstrate Lambeth’s positive approach to serviced visitor accommodation in recent years. It also justifies a managed approach going forward.

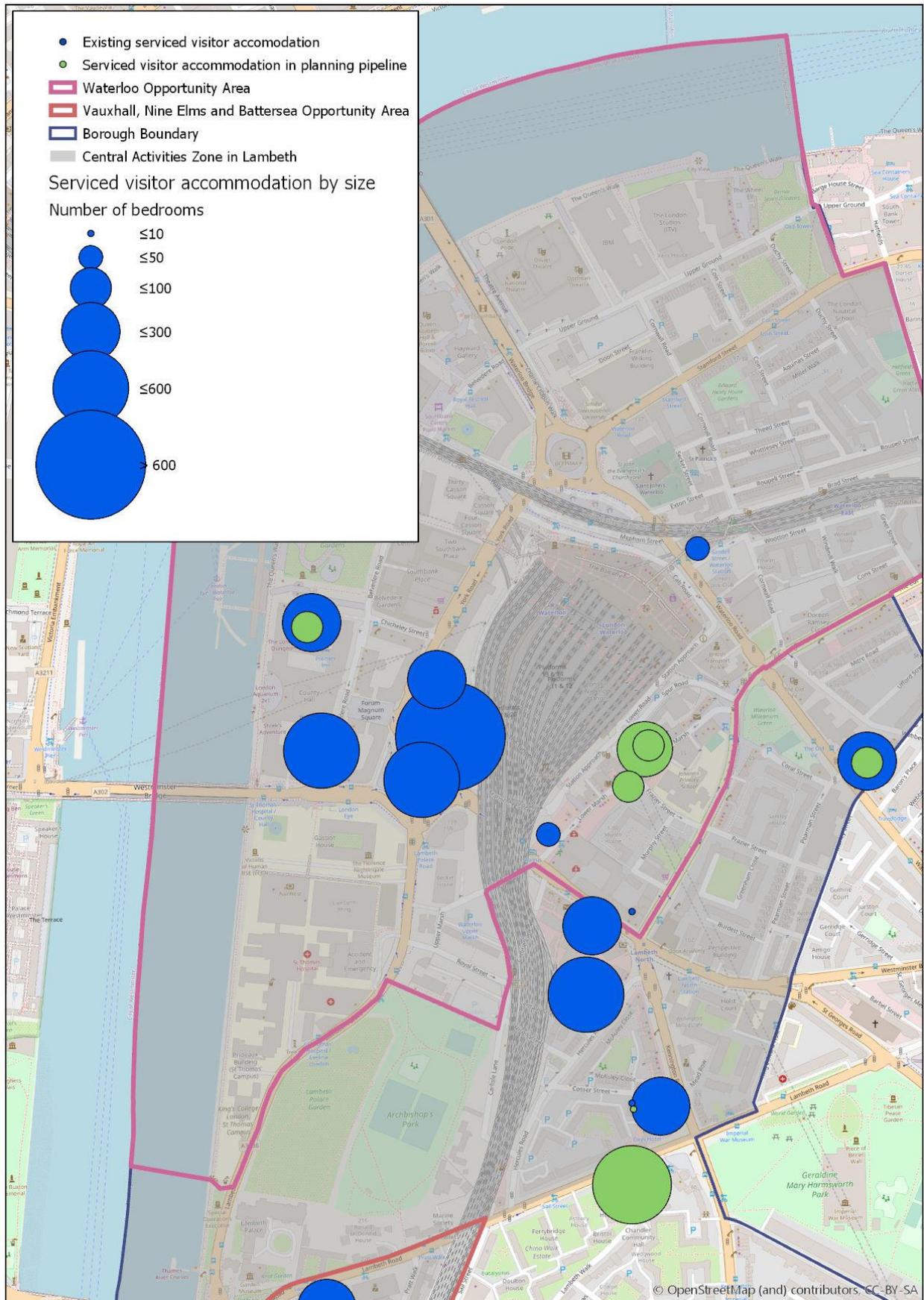
### Geographical distribution of serviced visitor accommodation in Lambeth

- 3.10. The growth in Lambeth’s serviced visitor accommodation has not been evenly distributed across the borough. The biggest concentration of visitor accommodation is found in Waterloo followed by Vauxhall (see map 1). Lambeth’s major and district town centres have seen more limited growth in serviced visitor accommodation in recent years.

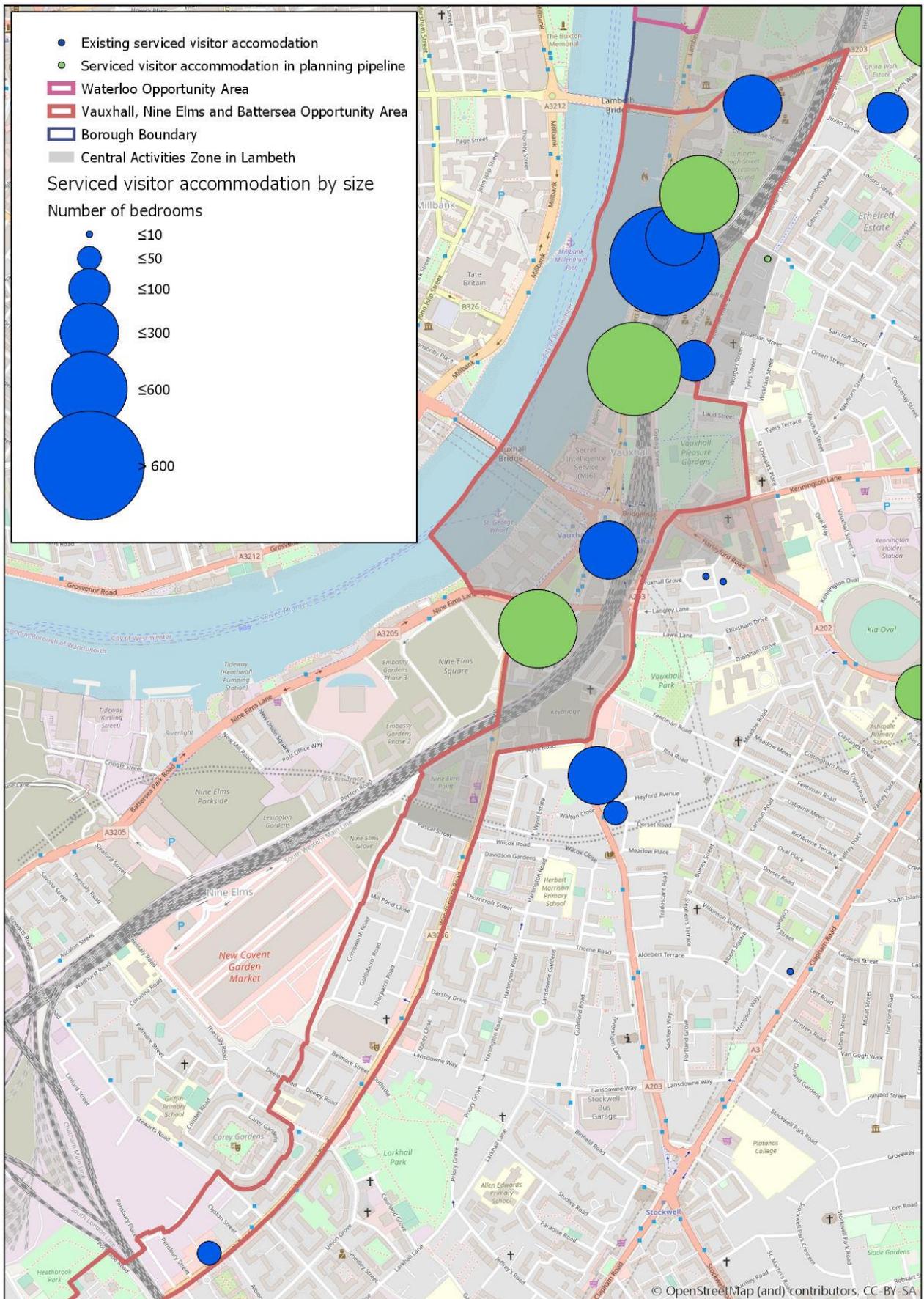
Map 1: Existing and pipeline of serviced accommodation by size



Map 2: Existing and pipeline of visitor accommodation in Waterloo by size

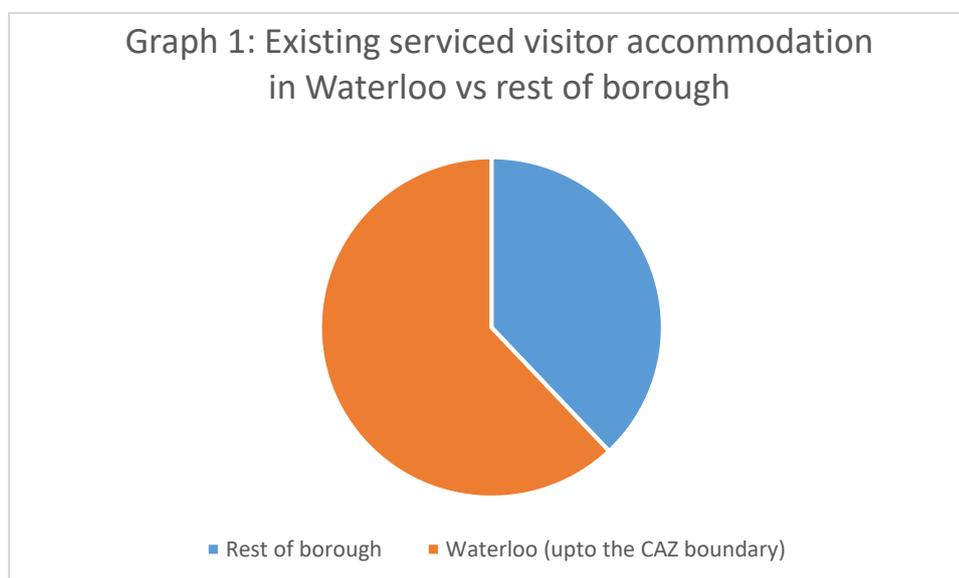


Map 3: Existing and pipeline of visitor accommodation in Vauxhall by size



## Waterloo

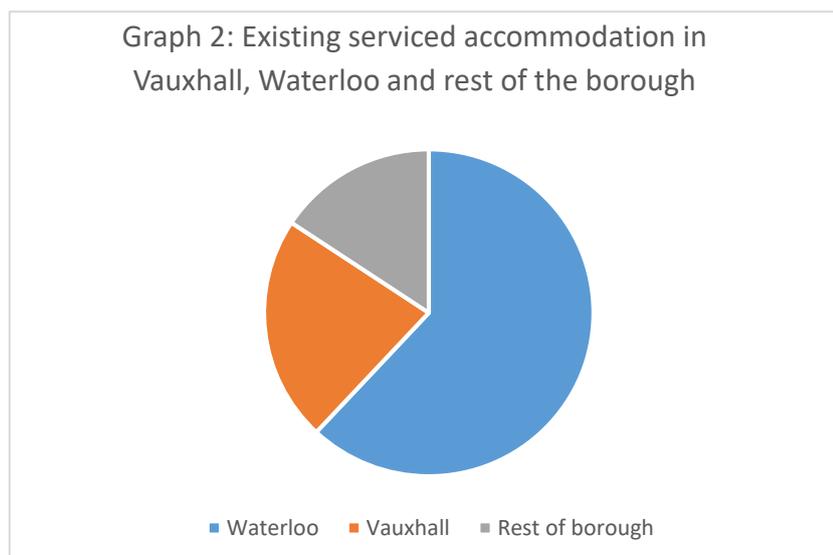
- 3.11. Compared to the rest of the borough, Waterloo has the biggest concentration of serviced visitor accommodation. The popularity of Waterloo as a location for visitor accommodation has resulted in a concentration in both the number of hotels and the number of rooms (see map 2).
- 3.12. As of March 2020, Waterloo Opportunity Area was the location of 2,321 rooms of serviced visitor accommodation (41% of all serviced rooms in the borough). The whole of the Waterloo area up to the boundary of the CAZ contained 3,510 rooms (62% of total serviced rooms in the borough). The majority of these rooms are hotel rooms although the area does have apart-hotel and guesthouse rooms. 748 of the 3,510 rooms have been completed since April 2015.



- 3.13. There is also a strong pipeline of further serviced rooms (see map 2). As of March 2020, there were 225 rooms in the development pipeline across seven establishments. 190 of these rooms are located in the Opportunity Area.

## Vauxhall

- 3.14. Vauxhall has also seen growth in the number of serviced rooms. As of March 2020, there were 1270 serviced rooms in the Opportunity Area as a whole (22% of all serviced accommodation in the borough). 1,223 of these rooms are located in the CAZ. Of all the serviced rooms, 423 have been delivered since 2015.



3.15. Vauxhall has a pipeline of additional serviced rooms (see Map 3). As of March 2020, there are three schemes in the development pipeline which will deliver 759 rooms, including permission for 618 rooms on the Vauxhall Island Site. All of these are located in the Opportunity Area. There are also two permissions granted subject to s106 which would provide an additional 800 rooms.

3.16. A range of hotel sizes have come forward in the Vauxhall Opportunity Area and Central Activities Zone. The median hotel size for existing hotels in Vauxhall is 148 rooms. The median hotel size for those existing and those in the pipeline (including those with permission subject to s106 agreement) is 187 rooms. Three hotels in the area (shown in italics in the table below) meets the definition of being strategically important, based on its known floorspace. As defined in the Draft London Plan, this is visitor accommodation with floorspace more than 20,000sqm.

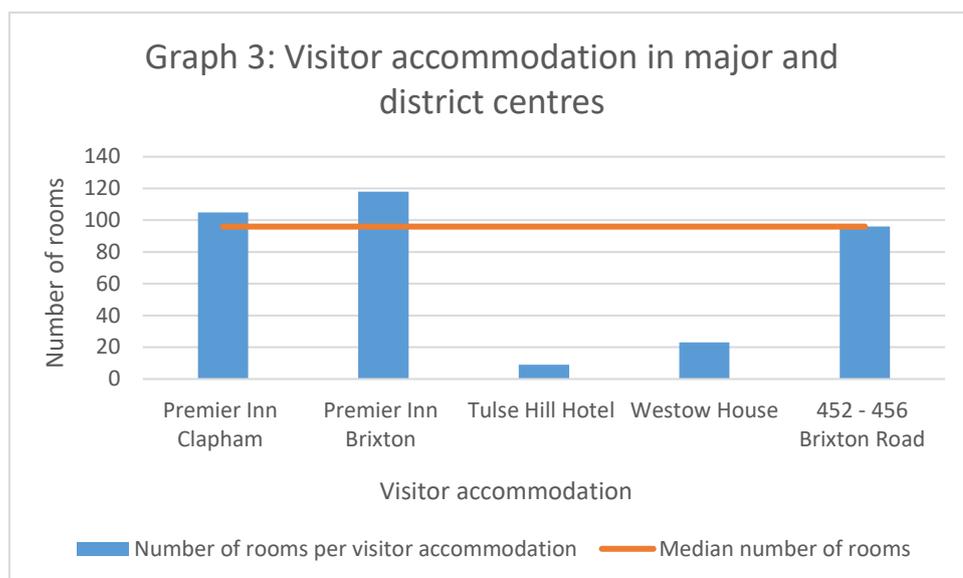
Hotel	Number of rooms	Status
Novotel London, Waterloo	187	Existing
<i>Park Plaza Riverbank</i>	<i>659</i>	Existing
Staybridge Suites	93	Existing
Travelodge	148	Existing
Crowne Plaza (former Wah Kwong House)	136	Existing
Vauxhall Square	136	Under construction
<i>Vauxhall Island Site</i>	<i>618</i>	<i>Unimplemented</i>

8 Albert Embankment	200	Permission subject to s106 agreement
<i>36-48 Albert Embankment</i>	<i>600</i>	<i>Permission subject to s106 agreement</i>

## Major and District Town Centres

3.17. As of March 2020 there were 242 serviced rooms in Lambeth’s major and district town centres. There are 96 rooms under construction or with unimplemented permissions. The median size of accommodation in major and district centres is 96 rooms, with the larger accommodation coming forward in major centres.

Serviced accommodation	Number of rooms	Major/District Town Centre	Status
Premier Inn Clapham	92	Lavender Hill/Queenstown Road District Centre	Existing
Premier Inn Clapham	13	Lavender Hill/Queenstown Road District Centre	Unimplemented permission for a hotel extension
Premier Inn Brixton	118	Brixton Major Centre	Existing
Tulse Hill Hotel	9	West Norwood/Tulse Hill District Centre	Existing
Westow House	23	Upper Norwood/Crystal Palace District Centre	Existing (B&B/Guesthouse)
452-456 Brixton Road	96	Brixton Major Centre	Unimplemented permission



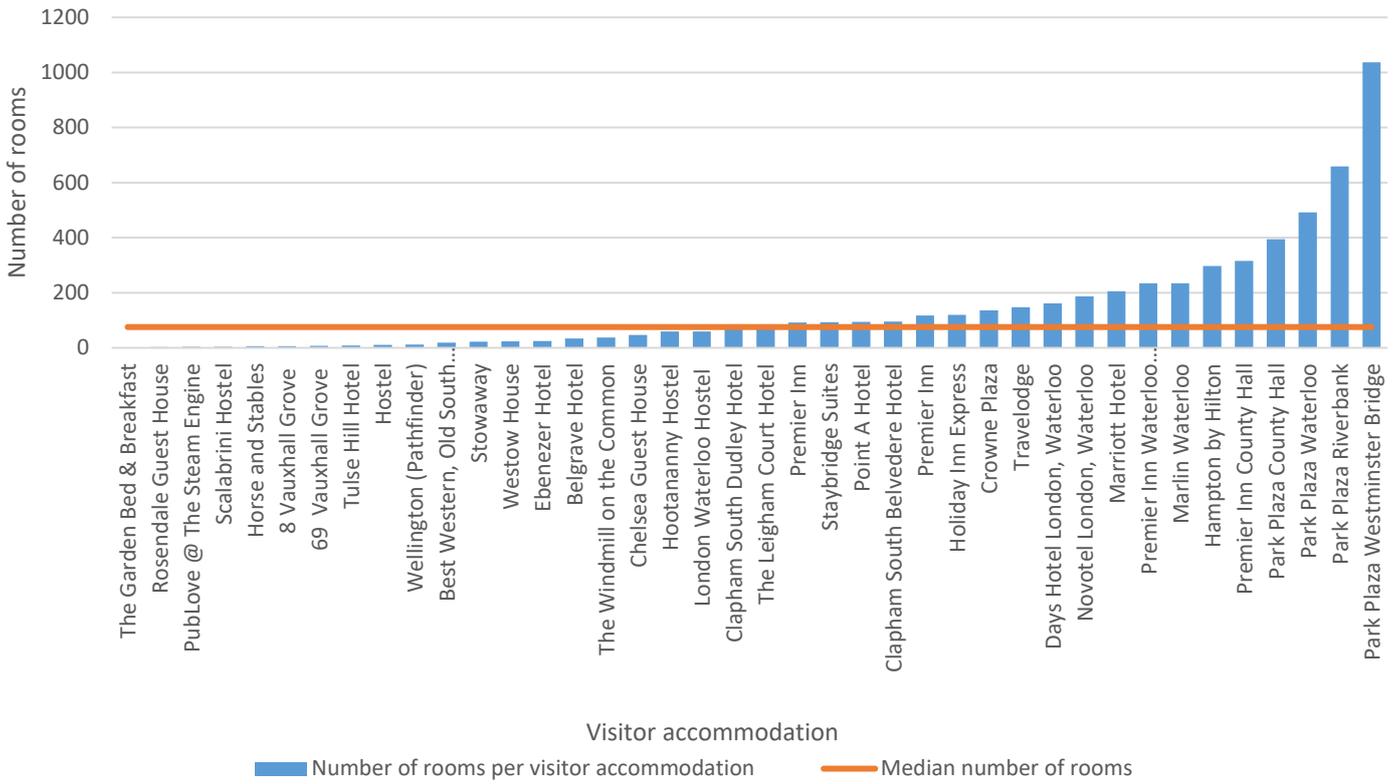
### Outside of major and district town centres

3.18. As of March 2020 there were 409 hotel rooms outside of major and district centres, with a particular concentration near Clapham Common. There are also a range of small guesthouses, bed and breakfasts and hostels outside of town centres providing 135 rooms. Some of these are located in local centres. Many of these permissions are historic and were granted under previous planning policy regimes in Lambeth.

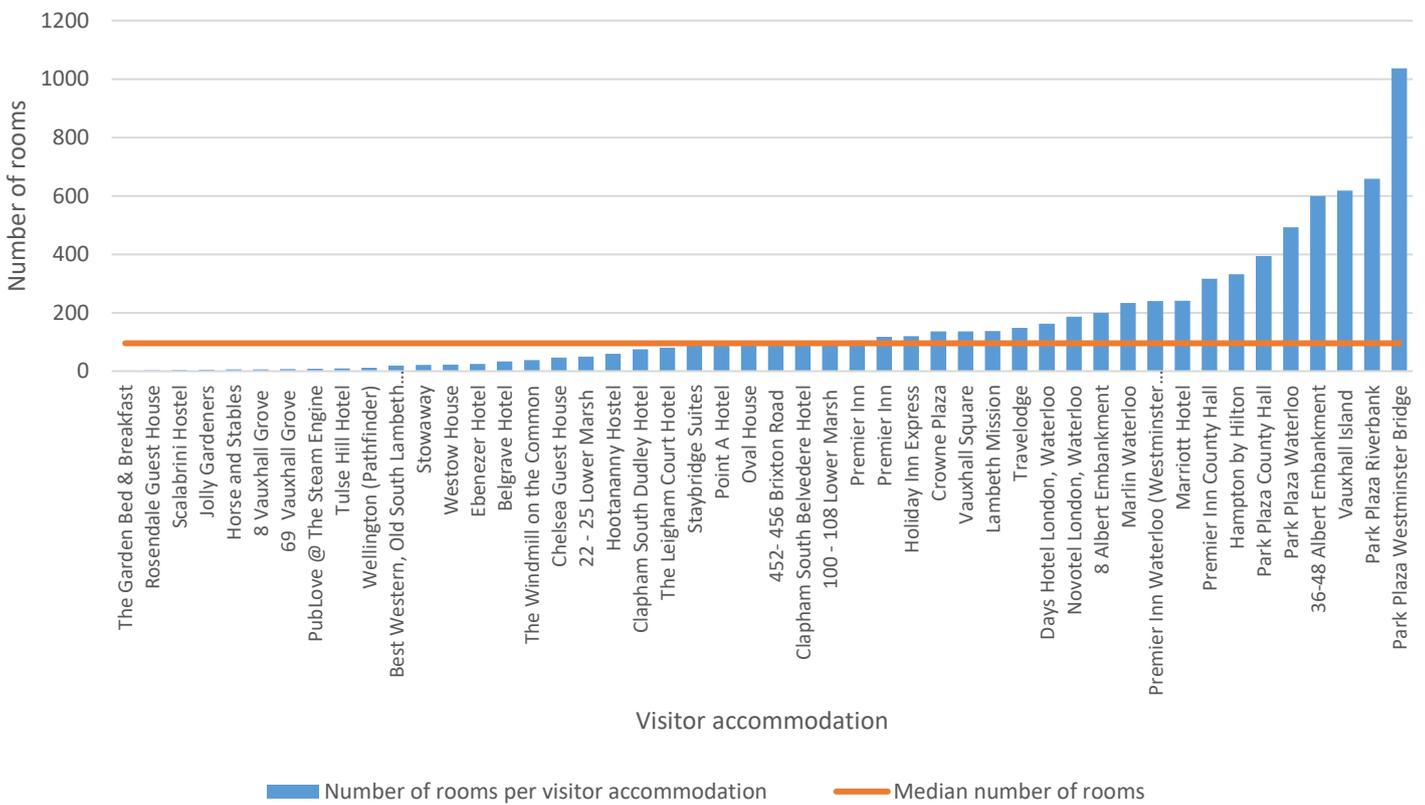
### Size of serviced visitor accommodation in Lambeth

3.19. Serviced visitor accommodation has come forward at a range of scales in Lambeth as demonstrated in the graphs below. Graph 4 shows the range of scale of existing serviced visitor accommodation, with the median size of accommodation being 75.5 rooms. Graph 5 shows that the median size of serviced visitor accommodation will increase to 95.5 rooms once the pipeline is implemented.

Graph 4: Existing visitor accommodation in Lambeth



Graph 5: Pipeline of visitor accommodation in Lambeth



## Non-serviced visitor accommodation in Lambeth

- 3.20. In addition to serviced rooms, there are other forms of visitor accommodation in Lambeth. These forms of ‘non-serviced’ visitor accommodation have potential to help meet the demand for additional visitor accommodation identified by the GLA.
- 3.21. This includes an estimated existing 768 student rooms in Lambeth available to visitors during vacation periods. These rooms are located across four different student premises in Lambeth (see Table 1.4 of the Hotels and Other Visitor Accommodation Pipeline 2018/19). Given a growing pipeline of purpose-built student accommodation in the borough, this number is expected to increase (see Student Accommodation Assessment 2018/2019 Pipeline Report and Topic Paper 9).
- 3.22. Another form of non-serviced visitor accommodation is short-term letting of residential accommodation. Under provisions in the Deregulation Act 2015, residential premises in London can be used as “temporary sleeping accommodation” for up to 90 nights in any calendar year without the need to apply for planning permission for a change use of use to visitor accommodation, if certain conditions are met. As the majority of short-term let hosts do not have planning permission to use their premises beyond the current 90 night limit, it is not possible to be certain about the number of short-term lets at any one time in Lambeth.
- 3.23. However, it is clear that short-term lets of permanent residential accommodation are increasingly available to visitors through on-line services such as Airbnb, Booking.com, Tripadvisor, HomeAway and FlipKey and, in recent years, the use of this type of accommodation appears to have increased significantly. The Airbnb UK Insights Report 2018<sup>1</sup> states that there were 75,700 active listings in London in 2018, hosting approximately 2,200,000 guests. A typical listing hosted guests for 35 nights per year. On the 1st January 2018, Airbnb recorded 4,300 active host listings in Lambeth, which was the 9th highest number of listing for all London boroughs (see Appendix 1). Data provided by Inside Airbnb recorded 4,603 listings in Lambeth in December 2019, with 51 per cent of the listings being for entire homes or apartments<sup>2</sup>.
- 3.24. These findings demonstrate a very strong supplementary supply of non-serviced visitor accommodation in Lambeth, in addition to the large stock and pipeline of serviced accommodation.

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<sup>1</sup> [Airbnb UK Insights Report 2018](#)

<sup>2</sup> [Inside Airbnb \(accessed December 2019\)](#)

## **4. Draft Revised Lambeth Local Plan – Proposed Submission Version January 2020 (DRLLP PSV)**

- 4.1. This section sets out an overview of draft policy ED14 and a justification for the proposed policy approach. In summary, ED14 of the DRLLP PSV recognises the economic benefits of visitor accommodation. In accordance with the strategic approach in the Draft London Plan, the policy seeks to ensure these benefits are distributed across the borough and seeks to avoid the intensification of the provision of serviced accommodation by focussing new visitor accommodation in major and district centres. The policy seeks to ensure that new visitor accommodation in Vauxhall is part of a mixed-use development and is of an appropriate scale so that it can be delivered alongside other much needed uses, such as housing, offices and workspace. It seeks to restrict further hotel development in Waterloo, to ensure a sufficient quantum of other priority uses can come forward in that Opportunity Area, particularly housing, offices and workspace.
- 4.2. Visitor accommodation will be required to demonstrate that it does not compromise a site's capacity to meet the need for conventional dwellings. All new visitor accommodation will be expected to mitigate any impacts on amenity and any impacts arising from an increase in visitor numbers. Visitor accommodation will be required to be accessible and be designed to a high standard so that it may be accredited by the National Quality Assessment Scheme. The draft policy seeks to ensure that the needs of business visitors are also met by requiring new hotels to make available facilities such as workspace and meeting rooms.
- 4.3. The paragraphs below provide further justification for key sections of the draft policy. Extracts from the draft policy are shown in italics.

*In accordance with London Plan policy E10:*

- a) *Outside of the Waterloo CAZ boundary and Vauxhall Opportunity Area and CAZ boundaries visitor accommodation (C1) will be supported in major and district town centres. In these locations, visitor accommodation should be of an appropriate scale for the proposed location and should not unacceptably harm the balance and mix of uses in the area, including services for the local residential community. Additional visitor accommodation outside town centres will not be permitted.*
- 4.4. ED14a) seeks to ensure that the benefits of tourism and new hotel proposals are spread across the borough. Outside of Waterloo and Vauxhall, visitor accommodation is directed towards Lambeth's major and district centres to spread the benefits of tourism to the south of the borough, with opportunities in Brixton, Streatham and West Norwood in particular. The Draft London Plan states that in outer London and those parts of inner London outside of the CAZ, serviced accommodation should be promoted in town centres and within

Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town Centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.

- 4.5. ED7a) of the DRLLP Proposed Submission Version states the council will support the vitality and viability of Lambeth’s hierarchy of major, district and local centres by supporting retail, service, leisure, recreation and other appropriate uses in these areas and by delivering the regeneration of Lambeth’s town centres. The approach will ensure that new visitor accommodation is directed towards major and district town centres and will ensure that the benefits, such as visitor spend, are realised by local businesses and services in major and district centres to help support their growth and regeneration and their role in Lambeth’s town centre network. As set out in Annex 1 of the Draft London Plan Intend to Publish December 2019 major centres generally contain over 50,000sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions. District centres provide convenience goods and services and social infrastructure for more local communities. As set out above, visitor accommodation can help support these functions through increased visitor spend. The approach to directing new visitor accommodation to major and district centres will also assist in ensuring that the role of local centres in meeting the day to day needs of communities is maintained. As identified in the DRLLP PSV, local centres provide a valuable service in meeting the day to day needs of communities and having key local retail uses within walking distance of home is important to many residents. As set out in paragraph 6.81 of the DRLLP PSV, the council wishes to ensure that the retail and service function of local centres is maintained and enhanced.
- 4.6. The Brixton Economic Action Plan 2017 sets out there is a need to increase diversity and the value of economic activity in Brixton. It identifies that emerging specialisms which make Brixton unique include specialist retail and food, its cultural and leisure offer and its strong civic society activity. Brixton attracts both local residents and visitors from London and the rest of the UK to use its services, amenities and leisure and cultural assets. Additional visitor accommodation in Brixton can help further support Brixton’s retail and food and drink offer such as the unique Indoor Markets and support the town centre’s many leisure and cultural uses through visitor spend.
- 4.7. PN4 of the DRLLP Proposed Submission Version states Streatham’s role as a major town centre in South London will be supported and enhanced to create a vibrant and viable town centre with a diverse economy including retail, leisure, offices, hotels and housing. One of the key actions of the Streatham Investment and Growth Strategy 2019 is to encourage local people to use the town centre and attract people from further afield by celebrating what is unique about Streatham, building an identity and harnessing civic pride. This

will partly be achieved through diversifying the town centre and local economy. As set out in the Investment and Growth Strategy, Streatham benefits from a range of leisure, cultural and community assets that attract people to visit the area. There is also potential for further growth in the early evening economy. The delivery of visitor accommodation in Streatham would help achieve these objectives of the Streatham Investment and Growth Strategy, with visitors supporting leisure, cultural and community assets and supporting the growth of the early evening economy, particularly the food and drink offer.

- 4.8. The West Norwood Manual for Delivery 2017 identifies an opportunity for the development of West Norwood/Tulse Hill as a cultural and heritage hub, with an opportunity to considerably strengthen the role of existing assets and to develop a cultural and heritage area in the southern part of the town centre. The Manual for Delivery also identifies the challenge of increasing town centre footfall. PN7b) of the DRLLP PSV carries forward this approach by promoting the district centre as a hub of community life and retail, commercial and cultural activity to ensure that development enhances the viability and vitality of the centre. New visitor accommodation in West Norwood has the potential to play a role in achieving these aspirations for the town centre and strengthening the cultural and heritage hub through visitor spend and a higher footfall.
- 4.9. The supporting text of the draft policy states that, when considering whether a proposal is of an appropriate scale, regard will be had to the location of the site and local circumstances. This will be considered on a case by case basis taking account of the type and location of the town centre as well as the scale of hotel in relation to existing visitor accommodation in the locality and other centres. 'Balance and mix of uses' will also be assessed on a site by site basis having regard to the characteristics of an individual locality, including existing concentrations of visitor accommodation, and the nature and scale of the proposed development. As stated in the supporting text, generally two uses of this nature will not be permitted on adjacent sites as this is considered to result in the intensification of the provision of serviced accommodation in an area that can compromise the balance of local land uses.
- b) *Additional visitor accommodation (C1) will be supported in Vauxhall outside of wholly residential streets or predominately residential neighbourhoods subject to the following area specific requirements:*
- i) *Strategically important hotels should be located in the parts of the Opportunity Area that are within the CAZ. Strategically important hotels and other forms of visitor accommodation will be supported in this location where they are part of a mixed-use development, do not result in the loss of office space or other strategic functions of the CAZ and do not intensify the provision of serviced accommodation in a way that*

*causes unacceptable harm local amenity or the balance of local land uses.*

- ii) In the rest of the Opportunity Area and in the parts of the CAZ that are not within the Opportunity Area, visitor accommodation of up to 100 rooms will be supported where they are part of a mixed-use development, do not result in the loss of office space or other strategic functions of the CAZ and do not intensify the provision of serviced accommodation in a way that causes unacceptable harm to local amenity or the balance of local land uses.*

- 4.10. In accordance with the Draft London Plan, visitor accommodation in Vauxhall will be supported subject to area specific requirements. In accordance with the Draft London Plan, strategically important hotels should be located in parts of the Vauxhall Nine Elms Opportunity Area that are in the CAZ. Strategically important visitor accommodation is defined in the Draft London Plan as more than 20,000sqm.
- 4.11. Vauxhall, due to its location in the CAZ and Opportunity Area, performs a number of strategic functions. The Draft London Plan identifies that there is a remaining potential for 18,500 new homes and 18,500 jobs in the Nine Elms Vauxhall area as a whole. The London Plan identifies the emerging CAZ retail cluster as having high commercial growth potential. As set out in the Topic Paper 3: Workspace, the London Office Policy Review 2017 identifies that based on a composite projection, taking account of historic trends and jobs forecasts, a net increase of 160,600sqm of office floorspace would be needed in Lambeth. The Lambeth Creative and Digital Industries Study 2017 identifies that Vauxhall offers one of few locations within Lambeth where significant new large office floorplates can be created and that developments have capacity to accommodate major new CDI businesses.
- 4.12. The requirement for visitor accommodation to come forward as part of a mixed-use development seeks to find the balance between delivering additional visitor accommodation alongside a range of other much needed uses in Vauxhall, including housing, offices and workspace. It also seeks to maintain the mixed-use character of the area. Whilst it is acknowledged that hotels and other forms of visitor accommodation provide a range of jobs in the hospitality sector, it is important that offices are protected to help deliver a broad range of jobs and employment opportunities in Vauxhall, including in the Creative and Digital Industries. Both the jobs delivered in the hospitality sector and those delivered through office and other forms of workspace will contribute to the London Plan targets for new jobs in the Nine Elms Vauxhall area as a whole.
- 4.13. In the rest of the Opportunity Area and in the parts of the CAZ that are not in the Opportunity Area, visitor accommodation of up to 100 rooms will be supported as part of mixed-use developments. The analysis in section 2

demonstrates that a range of hotel sizes have come forward in Vauxhall and the median size of existing hotels is 148 rooms. The median increases to 187 rooms based on the current pipeline of hotels. The proposed threshold is considered reasonable because it acknowledges that hotel operators require a minimum quantum of hotel rooms for operational reasons but seeks to balance the provision of new hotel rooms alongside other uses as part of a mixed-use scheme by supporting smaller hotels than have previously come forward in the area. It also ensures that larger hotels are directed towards the parts of the Opportunity Area that are in the CAZ, in accordance with the Draft London Plan.

4.14. When considering whether a proposal intensifies the provision of serviced accommodation and whether this causes unacceptable harm to local amenity or the balance of local land uses, the council will have regard to the location of the site and local circumstances. Generally, two uses of this nature will not be permitted on adjacent sites as this is considered to result in the intensification of the provision of serviced accommodation in an area that can compromise the balance of local land uses.

*c) No additional visitor accommodation (C1) will be permitted in Waterloo within the boundary of the Central Activities Zone.*

4.15. Waterloo, due to its location in the CAZ and Opportunity Area, performs a number of strategic functions. It is a mixed-use area containing a strategic transport hub, international cultural landmarks, health and educational institutions, offices and workspace. It is also a residential area and has a large number of active local community groups, with a residential population of approximately 10,000 people. Waterloo's existing hotels and other visitor accommodation contribute to the character of the area given its location in the CAZ and the area's range of visitor attractions and cultural facilities. However, as set out in section 2, Waterloo now has a very strong stock of hotels and serviced rooms with a strong pipeline of new visitor accommodation. There is also a stock of hotels in close proximity in Southwark (see map 1).

4.16. Given the recent rapid growth in this sector, the proposed approach to visitor accommodation in Waterloo going forward seeks to manage future development proposals by preventing a further intensification of visitor accommodation in the area. This is to maintain the current mix and balance of land uses and prevent harm to this balance as a result of a future over-domination by one type of use. It is also to ensure the need for other uses in the neighbourhood, particularly housing, offices and workspace, can be met. The approach is consistent with the Draft London Plan.

4.17. The proposed restriction on the intensification of hotels and a further increase in visitor numbers will therefore help to maintain the balance of uses in Waterloo and its mixed-used character, rather than tipping into becoming an area dominated by one type of use. Given the number and distribution of

hotels now present in Waterloo, the only way to maintain its current vibrant mixed use character - that also includes workspace, community facilities, arts and culture, residential uses, retail and food and drink – is to acknowledge that this particular part of London is now at capacity as far as visitor accommodation is concerned.

- 4.18. It is also important to remember that Waterloo is a residential neighbourhood and that long-standing communities live between and amongst the various 'CAZ' uses. Some of these communities have expressed concern over a period of years about the growing number of hotels in their neighbourhood, with respondents to the Local Plan Proposed Submission Version publication (December 2013 – February 2014) raising concern about the number of hotels locating in Waterloo. These respondents felt that an over-presence of hotels and other transient populations has a detrimental impact on the perception of local residents about living somewhere stable and felt there is a balance to be struck. At this time the council agreed it would continue to monitor the number of hotels in Waterloo and the cumulative impact of hotels on the area would be managed through ED12(a)(ii). This approach was found sound by the Inspector and the council has continued to monitor the hotels in Waterloo (as set out in section 2). However, the growth in hotels in Waterloo has continued and a change to policy approach is now considered necessary. This is reinforced by the response to public consultation at Regulation 18 on the emerging revised Lambeth Local Plan (see section 4 of this topic paper).
- 4.19. As set out in PN1 of the DRLLP Proposed Submission Version, the council wants to see housing come forward in Waterloo and South Bank in line with London Plan targets and to secure maximum benefits for Lambeth residents through the application of affordable housing policy. Table 2.1 of the Draft London Plan states Waterloo Opportunity Area's indicative remaining capacity for new homes is 1,500 new homes, in addition to those already delivered in the Opportunity Area since it was first designated. The London Plan identifies the CAZ retail cluster and the South Bank as having incremental residential growth potential. The supporting text to PN1 of the DRLLP Proposed Submission Version states that the eastern area of Waterloo offers development opportunities for appropriate uses including housing that can make a long-term contribution to the vision and objectives for the area. It also acknowledges that affordable housing is a priority for Waterloo, as in all parts of Lambeth. It will not be possible to deliver the housing needed in Waterloo if there is unrestricted potential for further hotels to come forward. Restricting further intensification of visitor accommodation will help to achieve these outcomes by acknowledging that Waterloo already has a strong stock and pipeline of hotels that contribute to its character but any further intensification of this use will harm the character of the area and will limit the potential of other much needed uses coming forward.
- 4.20. In addition to housing, PN1 of the DRLLP Proposed Submission Version states Waterloo and South Bank will continue to be a thriving and competitive

area playing a key role in the central London and Lambeth economy. It will be a major location for offices, creative and digital industries, healthcare, MedTech and life sciences businesses and higher education. Table 2.1 of the Draft London Plan states Waterloo Opportunity Area's indicative capacity for jobs is 6000 new jobs. The Waterloo CAZ retail cluster and the South Bank are identified as having medium commercial growth potential. It is acknowledged that hotels and other forms of visitor accommodation provide valuable jobs in the hospitality sector in Waterloo. However, going forward, and again given the number of hotels already in the Waterloo area, the council wants to ensure that a full range of employment opportunities and jobs are provided through the development of sites for office and workspace. This will help achieve London Plan targets and aspirations for Waterloo to be a major location for offices that can provide space for major employers as well as smaller businesses in industries such as creative and digital. Hotels, particularly those at the budget end of the market, typically do not provide the jobs densities associated with offices, med-tech and other job-creating forms of commercial development.

*e) In all locations set out above, proposals for visitor accommodation (C1) will be acceptable only where it can be demonstrated that the development does not compromise a site's capacity to meet the need for conventional dwellings, especially affordable family homes.*

4.21. As set out previously, Lambeth recognises the importance of tourism and the need to contribute to London's demand for visitor accommodation. However, this should not be at the expense of Lambeth meeting its housing need. Policy H1 of the DRLLP Proposed Submission Version states that the council will seek to maximise the supply of additional homes in the borough to meet and exceed Lambeth's housing requirement of 13,350 homes for the ten year period 2019/20 to 2028/29. Existing self-contained C3 housing will be safeguarded in accordance with London Plan policy H8.

4.22. To prevent new visitor accommodation from reducing Lambeth's ability to meet and exceed its housing requirement of 13,350 homes between 2019/20 and 2028/29 and to prevent the displacement of existing C3 uses, new visitor accommodation will only be acceptable where it can be demonstrated that the development does not compromise a site's capacity to meet the need for conventional dwellings, especially affordable family homes.

4.23. The supporting text to ED14 sets out that when considering whether a proposal for visitor accommodation would compromise capacity to meet the need for conventional dwellings in the borough the council will have regard to:

- whether a proposal would displace existing C3 residential accommodation
- whether a site has been allocated for housing

- whether a site has been identified in the London SHLAA and/or Local Plan housing trajectory as having capacity for conventional housing
- whether a site has an extant or historic planning permission for C3 housing

*j) All new hotels will be expected to provide facilities for business visitors, including meeting rooms and workspaces. The potential for business and leisure facilities within hotels to be made available for public use in locations where there is an identified shortage of provision will be explored. Public use of hotel facilities will be secured through planning obligations.*

- 4.24. All new hotels will be expected to provide facilities for business visitors, including meeting rooms and workspaces. This is consistent with the Draft London Plan which states that in addition to leisure visitors the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres. In areas with an identified shortage of workspace and meeting space, the council will explore the potential for these business facilities to be made available for use of other local small businesses at agreed times. As set out in the Topic Paper 3: Workspace, the London Office Policy Review 2017 identifies that based on a composite projection, taking account of historic trends and jobs forecasts, a net increase of 160,600sqm of office floorspace would be needed in Lambeth. Within Lambeth specifically, in the period between 2009/10 and 2018/19, there has been a net loss of over 223,000 sqm of B use class floorspace – of which around 150,000 sqm net was within the B1a office use class. The topic paper concludes that the reduction in stock availability, and the uplift in rents and business rates may have therefore contributed to the recent fall in small businesses across Lambeth. The space for workspace and meeting rooms made available in hotels could therefore contribute towards meeting this demand, particularly for small businesses that can make use of flexible space.
- 4.25. To ensure that visitor accommodation offers benefits to local communities, where there is an identified shortage of leisure facilities in the location of the proposal (particularly swimming pools, gyms and other indoor or outdoor sports facilities) as set out in the Infrastructure Delivery Plan, the potential will be explored for any leisure of this type, provided as part of the hotel, to be made available for use by the general public at times to be agreed with the council. This provision and associated maintenance requirements of both business and leisure facilities would be secured through a legal agreement.

## 5. Consultation

- 5.1. ED14 of the DRLLP PSV 2020 has been developed through consideration of the consultation responses received during both the Issues consultation and the consultation on the Draft Revised Lambeth Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

### *Issues consultation 2017*

- 5.2. One of the key topics for the Issues consultation was hotels and other forms of visitor accommodation. Stakeholders were asked the following six questions relating to hotels and visitor accommodation:
1. *Short-term lets, like Airbnb and student halls, are a good way to meet demand for visitor accommodation in Lambeth alongside hotels. To what extent do you agree or disagree with this statement?*
  2. *If evidence shows that Lambeth has enough visitor accommodation to meet predicted future demand, Lambeth Local Plan policy should prioritise other uses, such as housing and workspace, over new hotels. To what extent do you agree or disagree with this statement?*
  3. *An over-concentration of hotels close to where people live can harm the amenity of residents, for example through the creation of noise, traffic and disturbance. Planning applications for new hotels should be required to assess their impact on residential amenity, including the cumulative impact of each new hotel. To what extent do you agree or disagree with this statement?*
  4. *New hotels should not be supported in Waterloo because there are enough hotels in that part of Lambeth. To what extent do you agree or disagree with this statement?*
  5. *Lambeth is experiencing an increase in planning applications for ‘serviced apartments’. These are like very small studio flats with their own kitchen and bathroom and there are concerns they will be used as permanent housing rather than by visitors. We are considering the need for a separate policy to manage this type of application. What are your views on this issue?*
  6. *Large new hotels should provide high quality employment, training and career opportunities for Lambeth residents. To what extent do you agree or disagree with this statement?*
- 5.3. Detailed analysis of the responses to these questions is set out in section 3.10 of the Lambeth Local Plan Review Issues Consultation Report October 2018. The responses are summarised as:
- The majority of respondents agreed that short-term lets are a good way to meet demand for visitor accommodation in Lambeth alongside hotels.

However, some respondents argued that short-term lets reduce the amount of accommodation available for housing and can have a negative impact on local communities.

- The majority of respondents agreed that if evidence shows that Lambeth has enough visitor accommodation to meet predicted future demand, other uses such as housing and workspace should be prioritised over hotels.
- The majority of respondents agreed that planning applications for new hotels should be required to assess their impact on residential amenity, including the cumulative impact of each new hotel due to the perceived ‘negative’ impact hotels can have on local communities, particularly in Clapham and Waterloo.
- 47% of respondents strongly agreed or agreed that new hotels should not be supported in Waterloo because there are enough hotels in that part of Lambeth due to the impact that hotels are having on the area. Respondents who disagreed or strongly disagreed argued that limiting hotels would constrain economic growth and that hotel proposals should be considered on a case by case basis.
- Respondents raised a number of issues with serviced apartments including the risk that this type of accommodation will be used for permanent accommodation, there is a greater need for general needs housing and serviced apartments have a negative impact on the local area.
- The majority of respondents agreed that large new hotels should provide high quality employment, training and career opportunities for Lambeth residents.

### Draft Revised Lambeth Local Plan October 2018

- 5.4. The feedback to the Issues consultation was considered alongside the evidence of hotels and other forms of visitor accommodation in Lambeth and the Draft New London Plan 2017 (as amended August 2018).
- 5.5. ED14 of the Draft Revised Lambeth Local Plan sought to ensure that Lambeth contributes to the need for additional visitor accommodation in London whilst also ensuring that new developments do not result in concentrations of visitor accommodation which can have a negative impact on local areas. The policy sought to ensure that new visitor accommodation is directed away from existing concentrations towards other appropriate town centre locations and that these developments are of the highest quality, are inclusive, do not harm the balance and mix of uses and do not negatively impact on residential amenity. The policy acknowledged the role of other forms of visitor accommodation in meeting the demand for visitor accommodation but sought to ensure that they do not compromise the supply of conventional housing.

- 5.6. The policy proposed to restrict additional visitor accommodation in Waterloo and introduced a cap on the number of bedspaces in Vauxhall of no more than 1282 net additional serviced bedspaces between 2019/20 and 2034/35.
- 5.7. P1 of the Draft Revised Lambeth Local Plan amended reference to Waterloo being a location for hotels to be consistent with ED14.
- 5.8. A total of 20 representations made specific comments on policy ED14. The Mayor of London did not comment on the policy, which implies no concern around general conformity of the proposed approach with the emerging Draft London Plan.
- 5.9. The main issues raised through the consultation are set out below. The full set of comments and the council's response to each comment made can be found in the Draft Revised Lambeth Local Plan October 2018 Consultation Report.
- 5.10. Two respondents offered general support for the policy and one developer supported the approach to hotels in Vauxhall. However, other hotel operators argued that the approach to hotels in Vauxhall was not in conformity with the London Plan. They also argued that well-managed hotels and residential uses can operate alongside each other and hotels can contribute to the balance and mix of uses in an area. In relation to the approach to hotels in Vauxhall, respondents argued that the cap on bedspaces was not justified and does not consider the locational and operational requirements of the tourism industry. Other respondents argued that cap would limit development and growth in the area and that the policy introduces a needs test for hotels, which has not been a requirement of national policy for over 10 years.
- 5.11. Developers and hotel operators argued that the restriction on hotels in Waterloo is an inappropriate barrier to the market, there is no justification to constrain strategic functions of the CAZ and that the policy is not flexible as demand may change over the plan period. Others argued that there is no robust evidence to demonstrate an over-concentration and the evidence base does not provide detail on occupancy rates or expected levels of demand. However, the proposed approach was supported by individuals in their response to draft policy PN1.
- 5.12. Two hotel operators argued that the restriction of hotels outside of town centres is overly restrictive, is inconsistent with the London Plan and NPPF and does not take account of the sequential test approach.
- 5.13. One hotel operator argued the requirement for all hotel rooms to benefit from natural daylight is not evidenced, positive, justified or effective and would artificially limit visitor accommodation.
- 5.14. This topic paper provides further justification for the proposed policy approach in the DRLLP PSV. In response to the comments received on the Draft

Revised Lambeth Local Plan October 2018, the following changes have been made to the draft policy ED14 in the DRLLP Proposed Submission Version:

- The proposed cap for additional rooms in Vauxhall has been removed to ensure the policy is effective. Visitor accommodation in Vauxhall will be subject to area specific requirements.
- The requirement for all hotel rooms to benefit from natural daylight has been removed to ensure flexibility in the design of schemes so long as they can be accredited by the National Quality Assessment Scheme. Visitor accommodation will be expected to make a positive contribution to townscape, be of high quality design and be designed to meet relevant quality standards so that it may be accredited by the National Quality Assessment Scheme. The Visit England scheme for hotel quality standards for hospitality and services, dining, bedrooms, bathrooms, public areas and external areas.

## 6. Conclusion

- 6.1. This topic paper sets out the rationale and justification for the proposed approach in draft policy ED14 of the DRLLP Proposed Submission Version. This approach seeks to ensure that Lambeth contributes towards the need for visitor accommodation in London whilst managing the intensification of this use in the borough alongside the requirement to meet the need for other much needed uses, particularly housing, offices and workspace. The policy approach recognises the benefits that both the visitor economy and visitor accommodation bring to the borough and seeks to spread the benefits to the south of the borough by directing new visitor accommodation to major and district centres to support their regeneration and growth aspirations. The policy also ensures that additional visitor accommodation does not come at the expense of Lambeth being able to meet its housing need, particularly for affordable housing. The overall policy approach is considered to be sound and is in general conformity with the Draft London Plan. It creates the conditions in which businesses can invest, expand and adapt in accordance with paragraph 80 of the NPPF.
- 6.2. The evidence set out in this topic paper demonstrates that Lambeth has been performing very strongly in delivering net additional serviced accommodation since 2015 and that considerable progress has already been made towards meeting the projected demand for the borough by 2041, many years ahead of this date.
- 6.3. This rate of delivery, whilst positive, has resulted in marked concentrations of new hotels and serviced rooms in some parts of the borough, particularly in Waterloo and Vauxhall (see map 1). As of March 2020, the whole of the Waterloo area contained 62 per cent of the total serviced rooms in the borough. The Vauxhall Opportunity Area contained 22 per cent of the total serviced rooms. These proportions will increase as a result of the additional permissions granted during 2019/20, assuming they are built out. The contribution of visitor accommodation to the character of Waterloo given its location in the CAZ is recognised. However, the proposed approach to visitor accommodation in this part of the borough going forward seeks to ensure that an appropriate balance of mix of uses is maintained and that no harm is caused to the character of the area, particularly in its residential areas. This is consistent with the Draft London Plan which sets out that the intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.
- 6.4. The Sustainability Appraisal of the DRLLP PSV recognises that this approach will help achieve a better sense of place and long-term social cohesion for local residents. This approach was also supported by residents during Regulation 18 public consultation on the emerging revised Lambeth Local Plan.

- 6.5. The approach to visitor accommodation in Vauxhall seeks to ensure that the area's mixed-use character is retained by requiring visitor accommodation to come forward as part of mixed-use development and is therefore delivered alongside other much needed uses such as housing, offices and workspace. This is particularly important given the area's location in the CAZ and Opportunity Area. The proposed area-specific requirements will ensure that the scale of visitor accommodation is appropriate to its location, which is consistent with the Draft London Plan and the suitable locations for strategically important accommodation.
  
- 6.6. Finally, the proposed policy approach will ensure that new visitor accommodation delivers a range of benefits, such as the facilities for business visitors, including meeting rooms and workspaces and that they are of a high quality design. The Sustainability Appraisal commends the requirement for visitor accommodation to meet high standards of accessibility and concludes this will positively contribute towards ensuring that everyday local services are accessibly and fully inclusive to all.

## **7. Bibliography**

GLA Working Paper 88 – Projections of demand and supply for visitor accommodation in London to 2050

Lambeth Hotels and Other Visitor Accommodation in Lambeth 2018/2019 Pipeline Report

Airbnb UK Insights Report 2018

Inside Airbnb Data accessed 2019

Lambeth Topic Paper 3: Workspace 2019

Lambeth Creative and Digital Industries Study 2017

London Office Policy Review 2017

Streatham Investment and Growth Strategy 2019

Brixton Economic Action Plan 2017

West Norwood Manual for Delivery 2017

Sustainability Appraisal Draft Revised Lambeth Local Plan Proposed Submission Version January 2020

## Appendix 1 Airbnb listings by London Boroughs January 2018

Borough	Number of listings
Tower Hamlets	7800
Westminster	7300
Hackney	6000
Kensington and Chelsea	5000
Camden	4800
Islington	4500
Southwark	4400
Lambeth	4300
Hammersmith and Fulham	3700
Wandsworth	3500
Brent	2200
Haringey	2000
Lewisham	2000
Newham	1700
Ealing	1500
Greenwich	1400
Barnet	1300
Waltham Forest	1200
Merton	1100
Richmond	1000
Hounslow	880
Croydon	760
Redbridge	570
Bromley	520
Enfield	480
City	450
Kingston	430
Hillingdon	380
Harrow	370
Barking and Dagenham	190
Sutton	190
Bexley	180
Havering	140

## Appendix 2

Serviced accommodation rooms granted permission in 2019/20

<b>Hotel</b>	<b>Number of rooms</b>
Vauxhall Square (18/02187/NMC)	-50
Lambeth Mission (18/03890/FUL)	137
Premier Inn Clapham 638 – 640 Wandsworth Road (18/05045/FUL)	+13
98 to 108 Lower Marsh (19/03123/FUL)	+23
Premier Inn Westminster Bridge Road London County Hall Riverside Building (19/03369/LB)	+6
Jolly Gardeners (19/03965/FUL)	+5
Oval House Theatre (18/04183/FUL) (included in 2018/19 pipeline)	95
Vauxhall Island (17/05807/EIAFUL) (included in 2018/19 pipeline)	618

Serviced accommodation rooms granted permission subject to s106 in 2019/20

<b>Hotel</b>	<b>Number of rooms</b>
36-48 Albert Embankment	600
8 Albert Embankment	200