

Lambeth Local Plan Examination

Waterloo Community Development Group

Matter 2.1 Spatial strategy – additional notes

(Mr Ball unable to attend Tuesday 27 October 2020)

The points we wanted to elaborate on were set out in our written response to Matter 2, but I did want to comment on Lambeth's response to (iii) in particular.

Firstly Lambeth's response states that there are references to the CAZ in the Introduction at 1.20 and 1.27 - but these are not in the Spatial Strategy, which is chapter 3; they are in the Introduction.

Secondly Lambeth propose inserting reference to the CAZ in a bullet point at 3.9 in the Spatial Strategy. Frankly a simple reference isn't sufficient. After an Introduction to the Plan and a second chapter setting out the evidence base and issues across the borough (including identifying six Spatial Planning issues), the Spatial Strategy should be setting out a spatial (i.e. geographical) strategy for where and how these issues are going to be addressed and the growth delivered. The fact is that the vast majority of the economic growth and much of the housing growth is going to be delivered in the north of the borough, in the CAZ and Opportunity Areas in particular, and to some extent in the areas closer to the CAZ and Opportunity Areas where that growth also impacts, plus Brixton town centre. Reading the Spatial Strategy one would not know this:

- The Spatial Strategy begins by again referring to the *non-spatial* borough-wide targets for housing and the expected overall net increases in retail and office floorspace. This has already been referred to. Besides, this apparently modest expectation of an 800m² increase in retail floorspace masks potentially huge shifts in *where* it is delivered - 12,000m² of retail has been recently implemented in Waterloo International, for example, while retail floorspace in some other parts of the borough has shrunk. Similarly, over the past 15 years over 47,000m² of older office stock along the Albert Embankment has been demolished and the land used almost entirely for market housing, but much of the office floorspace has been re-provided in nearby Vauxhall and in Waterloo. These are major *spatial* shifts. A Spatial Strategy should be identifying such shifts, and where and how the growth will be directed. (I reference Camden's and Islington's Spatial Strategies as good examples of boroughs in the CAZ who do this, and therein achieve an effective Plan.)
- Lambeth's Spatial Strategy then continues by listing a series of borough-wide requirements for social infrastructure - for which the Borough is largely responsible for delivering - only identifying spatial issues in referring to Jubilee Gardens and a new fire station at the Albert Embankment (which both happen to not be delivered by the Council)

- Only then (at 3.9) does it make reference to the spatial (geographical) specificity of where much of the growth would be directed - Waterloo and Vauxhall Opp Areas and 'town centre regeneration to appropriate locations'.

In our view it would be more logical and understandable if the Spatial Strategy set out where the growth was intended to be accommodated before then setting out the social infrastructure needed as a result of that growth.

Similarly the Spatial Vision largely talks in boroughwide generalities, only referencing geographical specifics in the second and fourth paragraph. The CAZ is never mentioned. And the fourth paragraph simply namechecks 14 different parts of Lambeth, including Waterloo and Vauxhall in the same list as Upper Norwood or Tulse Hill - areas where growth will be relatively limited, although it does (finally) go on to refer to the 'international cultural and tourist destination on the South Bank'.

We set out in our written representations the evidence for the current approach being largely ineffective. We need a *clearer* vision and strategy which identifies the centrality of the Opportunity Areas and the CAZ as the key spatial driver in the development of Lambeth, and openly acknowledges its opportunities and very specific constraints.

These are the points I would have sought to introduce in the roundtable on Matter 2 today.