

## **Lambeth Local Plan Examination**

### **Waterloo Community Development Group**

#### **Matter 2.1 Spatial strategy**

*(ii) Should the Plan set out and address the London Plan's Opportunity Areas (OAs), at Vauxhall/Nine Elms/Battersea and at Waterloo and reflect the indicative targets, for 18,500 new homes and 18,000 new jobs at Vauxhall/Nine Elms/Battersea and 6,000 new jobs at Waterloo?*

*(iii) Should the Plan provide a clear articulation of its relationship with the Central Activities Zone, including its relationship within the Central Services Area?*

Lambeth is one of seven London boroughs partly in the CAZ, the centre of Western Europe's biggest city. Most of Lambeth's growth over the past twenty years and in the next twenty is in the CAZ and the two Opportunity Areas. A third of Lambeth's jobs are in Waterloo, as well as Europe's biggest arts centre and some of the most touristed places on the planet. The growth in Central London is the core engine of the city as a whole, and North Lambeth plays a similar role for the borough, enjoying much of the investment, generating much cash through this development – including from CIL – and requiring a strong integrated vision to manage the inevitable conflicts such growth threatens.

The Spatial Strategy (sec 3) does not reflect this. The CAZ is not even mentioned, apart from a line on the Key Diagram. Waterloo and Vauxhall OAs are not mentioned in the Vision, merely namechecked as part of a list of 14 neighbourhoods around Lambeth; they are only mentioned in passing toward the end of the strategy, along with Brixton as a “focus for growth”, and toward the end of the Strategic Objectives, and then only under “F Creating and maintaining attractive, distinctive places”.

The evidence that the spatial strategy has been ineffective is all around. The most recent evidence supplied on 8<sup>th</sup> October (JLL Commercial Office Baseline Report for LBL) confirms the fact that the office market and development is underperforming. Sites lie undeveloped sometimes for decades (for example Elizabeth House received Outline Permission for 80,000m<sup>2</sup> of office in 1996, and there has been several permissions since, including the most recent in 2019) and there has been a net loss of over 150,000m<sup>2</sup> of office across the two OAs over the past 15 years.<sup>1</sup> Meanwhile there has been an over-provision of hotels, something belatedly acknowledged in the proposed policy restriction on hotels in the north. There has been a susceptibility to sinking considerable energy into supporting untested novelties unrelated to strategy, such as the Garden Bridge. Lambeth has succumbed to pressures by developers for tall buildings which exceed policy and guidance, a considerable number of which have been called in, and have left a confused skyline (again, belatedly, the proposed Tall Buildings policy in the London Plan and Local Plan are potentially

---

<sup>1</sup>Appendix 1: email of M. Ball

more effective in seeking to identify sites where tall buildings would normally be restricted). And there has been the development of a lot of high-rise housing in the north which is largely proving incapable of being used for residential or supporting communities since much of it remains empty for investment purposes<sup>2</sup>

The shortcomings of the Spatial Strategy on this point is reflexive: the Council too often fails to understand the potentialities and problems of the north of the borough, and the Council is fundamentally disconnected politically and administratively.

The Council is the key agent responsible for shaping Lambeth's future. The Local Plan is its key tool. The Spatial Strategy, Vision and Strategic Objectives as drafted are unsound because ineffective to encourage, shape and manage the key areas for growth in Lambeth, including integrating that growth for the benefit of Lambeth as a whole.

Good examples of Local Plans with Spatial Strategies which clearly identify the importance of the CAZ and the areas for growth are Camden's Local Plan<sup>3</sup> and Islington's Local Plan<sup>4</sup>

---

<sup>2</sup>The most egregious example is the Vauxhall Tower, see The Guardian 24/5/16

<sup>3</sup><https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

<sup>4</sup>[https://www.islington.gov.uk/~/\\_media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicnotices/20182019/20181119localplanstrategicandmpoliciesdpdreg18nov2018reducedsize1.pdf](https://www.islington.gov.uk/~/_media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicnotices/20182019/20181119localplanstrategicandmpoliciesdpdreg18nov2018reducedsize1.pdf)

## APPENDIX 1

**From:** Michael Ball [mailto:Michael.Ball@wcdg.org.uk]

**Sent:** 22 October 2014 23:25

**To:** Peck, Lib Cllr

**Cc:** Joyce, David; Haselden, Nigel Cllr; Amos, David Cllr; Atkins, Liz Cllr; Birley, Anna Cllr; Chowdhury, Rezina Cllr; Clark, Malcolm Cllr; Hopkins, Jack Cllr; Parr, Matt Cllr; Brathwaite, Jennifer Cllr; Briggs, Tim Cllr; Simpson, Joanne Cllr; Simpson, Iain Cllr; Winifred, Sonia Cllr; Prentice, Sally Cllr; Pickard, Jane Cllr; Gentry, Bernard Cllr; Nathanson, Louise Cllr; Wilcox, Clair Cllr; Edbrooke, Jane Cllr; Kind, Ben Cllr; Morris, Diana M Cllr; Hill, Robert Cllr

**Subject:** Why is Lambeth haemorrhaging jobs?

Dear Lib

As you may know, WCDG has objected to the loss of employment generating sites in relation to a number of applications over recent years, most recently at Bondway and at 3 and 8 Albert Embankment.

I noted the reply from officers to questions raised by Cllr Wilcox and other members at PAC in August for the Bondway scheme about whether an estimated 124 additional jobs was significant given the target of 25,000 jobs for the VNEB. David Joyce reassured members that it was.

Given this, I hope you can help me understand Lambeth's strategy regarding planning for jobs. I have gone through the files and calculate that over the past decade **Lambeth has seen a net loss of 167,000m<sup>2</sup> of B1 office space** in the VNEB and Waterloo Opportunity Areas alone, which would be capable of sustaining between 8,800 and 13,400 jobs, depending on the methodology used to calculate employment densities[1]. Examples of office space lost in Waterloo since 2004 include the full range from large offices and purpose-built HQ buildings to smaller serviced offices. The loss is mainly to residential development, but also to student accommodation and to hotels. **The losses at Waterloo and Vauxhall far exceed the targets for new jobs.** These losses continue and are speeding up. For the details of this please see the tables I have attached below.

There are two big new office schemes in the system, at Shell and Elizabeth House, but the Shell Centre scheme does not produce a significant net increase in B1 office space[2]. Were Elizabeth House to be permitted and then implemented it would provide a net increase on the site of 46,000m<sup>2</sup>. Were this to be included, the overall net loss would still stand at **121,000m<sup>2</sup> or between 6,400 and 9,700 jobs**. But there are no other comparable sites available in Waterloo or Vauxhall capable of providing any additional such large scale office development, and smaller office sites like 10 Leake St are also being lost.

Waterloo is one of the best-connected transport nodes in the country, with capacity for 100 million train users and 4 underground lines, plus 35 bus routes. It was zoned for City office overspill in the Greater London Development Plan and accommodated the largest single office development in Europe at Shell. Being close to Parliament the area is home to many third sector organisations, large and small. This use continues along the Albert Embankment down to Vauxhall, but is being completely washed away by the redevelopment into housing, hotels and student accommodation.

This issue is largely in your control, of course. Unlike Westminster Council, for example, Lambeth has clear planning policies designed to protect existing employment sites. And as a result of lobbying the Council received a DCLG dispensation from permitted development rights of change of use from office to residential for Waterloo and VNEB. This protection does not pertain in the rest of Lambeth and London outside the CAZ. But Lambeth does not appear to be taking advantage of it. As you know, in general Lambeth's planning policy for the CAZ requires developers providing evidence that offices are no longer suitable for employment use; or that the site is vacant and there is no reasonable prospect of re-use, including evidence of marketing; exceptionally a change of use to Central London Activities is permissible if there is compensation for the loss of employment. Unfortunately these safeguards were not utilised in the case of Bondway, and weren't even referred to in the case of 3 Albert Embankment, let alone enforced.

With yet another such scheme coming forward at 1 Lambeth High Street, I would be grateful if you could point me towards Lambeth's strategy for retaining jobs in the borough.

All the best

**Michael Ball**

**Director**

Waterloo Community Development Group

14 Baylis Rd, London SE1 7AA

[www.wcdg.org.uk](http://www.wcdg.org.uk)

020 7633 9291/ 07948 993321

This email and any notes attached with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. Waterloo Community Development Group is a charitable company limited by guarantee registered in England and Wales under company registration number 4269850 and registered office at 14a Baylis Road, London SE1 7AA.

[1] English Partnerships guidance on employment densities suggests 19m<sup>2</sup> per employee in general offices; the GLA has recently adopted a much higher density of 12.5m<sup>2</sup>. I have taken these as the maximum and minimum in the figures presented.

[1] Technically there is actually a net loss of 6,000m<sup>2</sup> of office space at Shell, but this is partly due to how the enormous basements are calculated.

[1] E.g. visitor attractions, hotels, government buildings etc – but residential is explicitly excluded.

[1] 3 Albert Embankment

[1] 69-71 Bondway

[1] 1 Lambeth High Street

**WATERLOO SITES**

<b>SITE</b>	<b>PREVIOUS employment use</b>	<b>PREVIOUS OCCUPANT</b>	<b>NEW Employment B1</b>	<b>STATUS</b>
County Hall Island site	22,800m2	GLC offices		Permitted 2008: complete
Addington Street	5,436m2	Serviced offices		Permitted 2006: complete
General Lying-In Hospital	1,191m2	St Thomas' Hospital		Permitted 2009: completed
75 Westminster Bridge Rd	6,000m2	third sector		Permitted 2013: completed
Doon St	vacant	n/a	5,415m2	Permitted 2008
157 Waterloo Rd	4,100m2	Church offices		Permitted 2008: completed
Hercules House	12,189m2	Govt + SMEs		Permitted 2013: on site
111 Westminster Bridge Rd	7,803m2	Costain HQ	683m2	Permitted 2011: on site
199 Westminster Bridge Rd	8,864 sqm	offices	384m2	Permitted 2013: on site
118-120 Westminster Bridge	3,768m2	Lambeth Building Society		Permitted 2009; completed
<b>TOTAL</b>	<b>72,151m2</b>		<b>6,482m2</b>	

## VAUXHALL SITES

<b>SITE</b>	<b>PREVIOUS employment B1 use</b>	<b>PREVIOUS occupant</b>	<b>NEW employment B1</b>	<b>STATUS</b>
Vauxhall Sq	14,876m2 B1	Cap Gemini	22,732m2	Permitted 2011
Keybridge Hse	70,000m2 B1	BT	2,835m2	Permitted 2014
Sky Gardens	2,240m2 B1		4,722m2	Permitted 2010: on site
1-9 Bondway	2,640m2 B1	Office and retail	-	Permitted 2011: on site
69-71 Bondway	8,597m2 B1, B8	Office and storage	6,023m2	Permitted 2014
Vauxhall Cross	vacant		2,192m2	Permitted 2012
Sainsbury's 9 Elms	8,000m2 A1	Sainsburys	1,860m2	Permitted: on site
30-60 South Lambeth Rd	vacant			Permitted 2012
<b>TOTAL</b>	<b>98,393m2</b>		<b>40,334m2</b>	

## ALBERT EMBANKMENT SITES

<b>SITE</b>	<b>PREVIOUS employment B1 use</b>	<b>PREVIOUS occupant</b>	<b>NEW employment B1</b>	<b>STATUS</b>
3 Albert Embk	6,083m2	Various SME	1,441m2	Permitted 2014
8 Albert Embk	21,097m2	London Fire Brigade HQ	3,785m2	Refused 2013

9 Albert Embk	6,500m2	British Steel		Permitted 2001: built
10 Albert Embk	6,070m2	Wah Kwong House		Permitted 2013: on site
12-18 Albert Emb	12,000m2	Govt offices		Permitted 2001: built
20-26 Albert Emb	16, 400m2	Govt offices	1,272m2	Permitted 2011: on site
27-9 Albert Embk	3,700m2		932m2	Permitted 2012
<b>TOTAL</b>	<b>47,053m2</b>		<b>3,645m2</b>	