

## EXAMINATION OF THE DRAFT REVISED LAMBETH LOCAL PLAN 2020 - 2035

Further Statement in Respect of Matter 2: Spatial Strategy,  
Vision and Objectives

### 2.1 Spatial Strategy

Submitted on behalf of

**PPHE Hotel Group**

9 October 2020

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## 1. INTRODUCTION

1.1 DP9 Ltd act on behalf of PPHE Hotel Group (“**PPHE**”) in relation to the Draft Revised Lambeth Local Plan (“**DRLP**”) Examination.

1.2 This Hearing Statement addresses matter 2.1 (spatial strategy) and in particular the Inspector’s question:

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

1.3 In summary, it is PPHE’s case that:

- The London Plan sets clear strategic priorities for the Central Activities Zone (“**CAZ**”), which are different from those set for areas outside the CAZ.
- If London boroughs fail to follow the strategic imperatives set out in policy 2.10A of the London Plan, the strategy set out in the London Plan will be frustrated.
- The DRLP (at paragraph 1.20) recognises the designation of the north of the borough as part of the CAZ “*promoted for finance, specialist retail, tourist and cultural uses and activities.*”
- The guiding spatial approach (DRLP paragraph 3.9) and the spatial vision (on page 53) fail to set out a vision for that part of Lambeth which lies within the CAZ, and thereby fails to recognise the distinction between the CAZ and land falling outside the CAZ.
- The failure to set out a distinct vision for the CAZ causes the DRLP to:
  - i. Fail to be in general conformity with the London Plan (a matter of legal compliance considered in a different session of the examination).

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- ii. Fail to set the framework or vision for spatial policies to implement the vision for the CAZ.
  - iii. Fail to be positively prepared in delivering the vision for the CAZ.
  - iv. Fail to set an appropriate strategy for that part of the borough falling within the CAZ.
  - v. Fail, contrary to paragraph 80 of the National Planning Policy Framework (the “**NPPF**”), to create the conditions in which businesses which can contribute to CAZ functions can invest, expand and adapt.
  - vi. Fail, contrary to paragraph 82 of the NPPF, to address the specific locational requirements of sectors which are suited to meet CAZ objectives, including those which contribute to sustaining and managing the attractions of the CAZ as the world’s leading visitor destination (as referred to at London Plan Policy 2.10A(g)) such as PPHE.

1.4 It is PPHE’s case that, in addition to legal compliance issues<sup>1</sup>, the DRLP would be unsound if it failed to set a distinct vision for that part of the borough which lies within the CAZ.

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<sup>1</sup> The plan must be in general conformity with the spatial development strategy: section 24(1)(b) of the Planning and Compulsory Purchase Act 2004

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## 2. THE LONDON PLAN

- 2.1. The adopted London Plan Policy 2.10A(g) 'CAZ – Strategic Priorities' seeks to sustain the CAZ as a world-leading visitor destination. The supporting text to Policy 2.11 'CAZ – Strategic functions' further states that *"the visitor economy is important to London as a whole, and there will be a need to ensure that the CAZ retains its status as a world-class visitor destination, while also meeting the needs of those who live and work there."*
- 2.2. The Intend to Publish London Plan Policy SD4 states that the unique international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced. Supporting text in paragraph 2.4.4 of Policy SD4 states that *"the strategic functions of the CAZ include, but are not necessarily limited to... j. tourism facilities including hotels and conference centres."*

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### **3. EMERGING LAMBETH PLANNING POLICY**

- 3.1 DRLP Section 3 outlines the emerging spatial vision for the Borough.
- 3.2 The spatial approach and spatial vision fail to set out a distinct approach and vision for the CAZ. As a result, the important strategic priorities set out in the adopted London Plan Policy 2.10 and in Draft London Plan Policy SD4 are not reflected in the Local Plan.
- 3.3 As an example, references to the visitor economy and tourism functions (save for a reference to public transport capacity) have been omitted from the spatial strategy and spatial objectives.

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#### 4. NPPF TESTS FOR SOUNDNESS

4.1 By failing to set out a distinct vision for the area of Lambeth falling within the CAZ the DRLP fails to set an appropriate strategic framework to plan for and encourage uses which are appropriate in the CAZ and contribute to the strategic functions of the CAZ.

4.2 As a result of that failure, and applying the different limbs of the soundness test in paragraph 35 of the NPPF, the DRLP is:

- **Not positively prepared** as it does not set out a strategy to advance the priorities for the CAZ.
- **Not justified** as there is a failure to set a vision for the CAZ; and no basis for why references to the visitor economy and tourism functions within the CAZ have been omitted.
- **Inconsistent with national policy** in the NPPF, in particular with those policies for ‘building a strong, competitive economy’ in Chapter 6 of the NPPF.

4.3 Using visitor facilities as an example of how the failure to set a strategy for the CAZ will undermine business confidence:

- The DRLP sets no local strategy to implement the strategic objective in London Plan policy 2.10 to sustain and manage the attractions of the CAZ as the world’s leading visitor destination.
- By not recognising the businesses serving the tourism sector, the draft spatial vision does not help to foster an environment in which these types of businesses can thrive and adapt, resulting in it being inconsistent with NPPF paragraph 80, which 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*

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*each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

- There is no economic vision or strategy for the CAZ which positively and proactively encourages sustainable economic growth, contrary to paragraph 81(a) of the NPPF, which states that *“planning policies should: a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.”*
- Furthermore, the locational requirements of businesses serving the tourism sector are not recognised in the strategy, contrary to paragraph 82 of the NPPF, which states that *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors....”*.

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## **5. CHANGES REQUIRED TO THE LAMBETH LOCAL PLAN**

5.1 For the reasons set out above, PPHE considers that the DRLP should be amended to set out a specific vision and strategy for the CAZ, which should be consistent with:

- The adopted London Plan Policy 2.10;
- Emerging London Plan Policy SD4;
- Chapter 6 of the NPPF, specifically paragraphs 80-82; and
- Chapter 11 of the NPPF, specifically paragraph 117.

5.2 In particular, the DRLP should be amended so as make reference to how the local plan will promote and enhance the CAZ's tourism functions, including by facilitating the provision of visitor accommodation.



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