

Lambeth Local Plan Examination

Waterloo Community Development Group

Matter 9 – Places and Neighbourhoods

Are the following policies positively prepared, justified, effective and consistent with national policy?

9.1 Policy PN1 (Waterloo and South Bank): including the proposals for Sites 5 (Elizabeth House, York Road, SE1), Site 6 (Shell Centre, York Road, SE1) and Site 9 (ITV Centre and Gabriel's Wharf, Upper Ground Street, SE1).

The London Plan ITP Policy D1 requires boroughs to “undertake area assessments to define characteristics, qualities and value of different places within the plan area”. In the explanatory text it continues “it is important to understand how places are perceived, experienced and valued. Those involved in commissioning or undertaking area assessments should consider how they can involve the widest range of people”.

The Waterloo OA Planning Framework was produced in 2004-07 with some consultation, which was some time ago and is relatively undetailed compared to the SPD produced in 2011-12 (which is not referred to in the opening paragraph of Waterloo and South Bank: Context and character 11.1 – why not?). However the most up-to-date assessment is the Neighbourhood Plan, which was widely consulted on over several years prior to its formal adoption in 2019 (not “made in Dec 2019” as stated in 11.3!) Therefore this should be taken as a baseline assessment of the area, and the Local Plan should be in general conformity with the Neighbourhood Plan.

Some elements of Policy PN1 are in such conformity, such as the Special Policy Area for Lower Marsh/The Cut/Leake St as set out in (c).

But one of the key findings in the development of the Neighbourhood Plan is the over-riding priority of achieving genuinely affordable housing. The context must be understood. In 1981 the proportion of housing in Bishops ward which was council stock was 68%, which had declined to 56% by 1991¹ Since then there has been several major developments of wholly private market stock, including 1,500 units on the Lambeth part of the South Bank (as well as a further 500 on the immediately adjacent part of Southwark), the loss of around 800 units of protected rents (including sale of the Church Commissioners stock in 2007), and the impact of Right to Buy. Using a small army of volunteers, WCDG has been undertaking an audit of the existing stock, which reveals that the majority of the new market stock (including RTB) has entered the unregulated private rented sector (including an element of airbnb), which now exceeds the social housing stock, whose proportion has declined to around 25%. This has had a major impact on the community's access to social housing (resulting in networks of extended families being broken up) even as it has seen the huge amount of housebuilding and conversions of offices to housing. Furthermore, a considerable amount of the new market housing has been left vacant and is used primarily for investment purposes – the result being that the number of registered voters has not risen as forecast by Lambeth 20 years ago, and current proposals for the Boundary Commission for England redraw the ward boundary and reduce representation from 3 to 2 councillors!

¹Lambeth Ward Profiles: 1991 Ward Census Information, LBL 1995

All of this indicates that achieving radically more genuinely affordable housing is the top priority (i.e. social rented housing; only around 100 intermediate units have been developed in Waterloo; land values are so high they require an income of over £70,000 p.a. to be affordable!). Policy PN1 does not reflect this priority: “affordable housing is a priority in Waterloo as in all parts of the borough” is incorrect, for no other part of the borough has seen such a decline in access to genuinely affordable housing, nor the increase in the amount of market housing and private rented housing.

The target of 1,500 additional homes in the OAPF of 2007 has been largely met by development, including the recent 800 units on the Shell site: why has that target simply remained the same? Furthermore, the main sites capable of delivering genuinely affordable housing are not even identified! The Coin Street sites were identified for affordable housing in the Waterloo District Plan 1977, outline planning permission was achieved in 1981, and they were acquired by the GLC and sold to the newly created Coin Street Community Builders for that purpose in 1984. Since then less than two thirds of the sites have been built out, and four remain: Doon St, Princes Wharf, Gabriel’s Wharf and the corner site of Cornwall Rd/Stamford St. These have remained housing sites since the 1981 permission, but are not identified as such in the DRRLP nor in Lambeth’s brownfield sites – despite there being an extant permission for a tower of 329 homes and a swimming pool on the Doon St site. These sites could deliver a very high quantity of genuinely social co-op housing (all CSCB’s housing is co-op) and should be included in the Local Plan and strenuous efforts should be made by the Council to help achieve the optimisation of these sites.

With over 26 million visitors annually on the South Bank (along with 100 million commuters) Waterloo has maximised its capacity for visitors, and is in danger of becoming a victim of its success, rendering the visitor attractions unattractive – the pleasure of the strolling South Bank being turned into an unpleasantly crowded scrum, for example. This was the major reason there was near unanimous local opposition to the Garden Bridge proposal, for example. We therefore support the moratorium on new hotels, but other references to growth in the leisure and visitor economy should be excised (at 11.8 and 11.9) and reference should be made to this saturation having been achieved.

There is a contradiction between the deletion of site 7 Waterloo Station, and the identification in the Tall Buildings study of part of the site as suitable for tall buildings. The main reason Network Rail backed away from redevelopment of the station was the recognition that considerable heights along Waterloo Rd could not be achieved without conflicting with the need to protect the Westminster WHS, and they provided a study to prove it. The very reason why the approach was initially supported was the public benefits which would flow from opening up the ground floor as a concourse providing pedestrian connections between Lower Marsh and York Rd, as the Site 7 policy sets out. It is nonsensical to propose tall buildings on a site which the landowner for the foreseeable future has decided is unviable, whilst deleting the policy which should secure the public benefits from any such development.

Regarding Site 9, which is currently under new ownership, permission was granted in 2018 for a tower of 270 homes (the text states that there is no planning history).

There should be no increase in car trips as a result of the growth in the area, contrary to para 11.11: Waterloo is one of the best public transport connected places in the UK, and the vision for growth should be to decrease car use, encourage pedestrian and cycle use, and improve air quality.

References to the Waterloo and South Bank Public Realm Framework should be excised: this was a wholly spurious document rejected by every single stakeholder in Waterloo, including the Neighbourhood Forum, both Business Improvement Districts, and many of the businesses and Trusts which own and manage the public realm in Waterloo.