

WeAreWaterloo
Build Studios
203 Westminster Bridge Road
London
SE1 7FR

London Borough of Lambeth Council
13 March 2020

Dear Sir/Madam,

Re: Draft Revised Lambeth Local Plan

Thank you for the opportunity to comment on the DRLLP. This representation is submitted on behalf of WeAreWaterloo Business Improvement District (BID).

WeAreWaterloo operates in the Waterloo area of central London. The BID was established in 2006 following a vote of local businesses, one of London's first Business Improvement Districts. We were renewed for a second five-year term in 2011, and for a third five-year term in 2016. The BID represents some 430 businesses in the Waterloo area and Lower Marsh Market as a subsidiary company of the BID. The operational arm of the BID supports these businesses and the market in various manners, including but not limited to public realm improvements such as additional green infrastructure, street cleaning, street lighting and public art projects, free & subsidised recycling for all businesses, and crime and security measures.

We are pleased to see within the DRLLP the designation of Lower Marsh/The Cut/Leake Street as a Special Policy Area. However, to make this more relatable to local businesses and to support this designation we would like to see a renaming of the Lower Marsh/The Cut/Leake Street Special Policy area to the Waterloo Retail Cluster (especially considering parts of Waterloo Road and Westminster Bridge Road are included within the designation) or equivalent appropriate designation.

Alongside this designation and to further LBL's own clear priorities to maintain this Special Policy Area as a hub for independent retail and business, we would like to strongly advise that LBL permits policy legislation which protects the current retail offering and importantly secures the long term future of the independent nature of the area. Within the DRLLP there are policies to protect affordable workspace and affordable housing, as can be expected. We firmly believe the same designation is justified to apply to the outlined Special Policy Area, with Lower Marsh as a specific focus. We would suggest that either a designation excluding national corporations (non-independent businesses) within a fair and reasonable distance of each other (in a similar expression as of that awarded to betting shops within the DRLLP) or a policy to cap business rates for strictly independent businesses would support and ensure the longevity of Lower Marsh and the special policy areas's unique and vibrant nature. This should form a part of future Section 106 obligations for developers within the special policy area. As representatives of Waterloo, we cannot stress enough how important this policy

would be in safeguarding the area as it inevitably develops and grows further.

Furthermore, we believe that temporary change of use classes should be supported within the local plan (not exclusive to Waterloo, but borough-wide). It is well known that as of 2020, the high street is suffering from online retail and service provision. Due to this and to secure the future of the businesses (and markets) around Lambeth, we believe a more fluid planning policy to support temporary change of uses would ensure that footfall to high streets would be encouraged. Specifically within the Waterloo special policy area, this would not be permitted to compromise the South Bank and Waterloo Neighbourhood Plan designation of Lower Marsh containing fewer than 50% of A1 and 30% of A3 uses. This policy would support high streets across Lambeth would be key to securing localised economies. In order that this change of use does not become temporary, we would suggest that there is a six month restriction on such change of uses.

We are disappointed to see within the DRLLP that no Waterloo specific regeneration projects are prioritised, especially considering the postponement of the Sandell Street redevelopment and the award of significant funds to redevelopment of the South Bank's Spine Route. After designation within the Waterloo and South Bank Draft Public Realm Framework we would hope to see Emma Cons Gardens and Station Approach considered as priority areas within the LLP. For those entering Waterloo, Emma Cons Gardens and Station Approach presents an unwelcoming and unpleasant first impression. To achieve the area specific priorities and borough wide strategic priorities we would strongly suggest that these two locations have significant and specific focus within the adopted LLP.

Specifically within this matter, Waterloo Station is omitted from the DRLLP as a priority project, which to the needs of the locality of Waterloo itself is vital. We would suggest that permeability to the south of Waterloo Station is encouraged.

Policy D4 (Planning Obligations) seeks to ensure Section 106 funding is secured to support and fund local improvements. As part of this, it is imperative that local stakeholders are consulted to ensure that the hyper-local knowledge of those living, working and studying within the affected regions are positively impacted by the impending developments. Within policy D4 it is vital that affected communities are consulted *prior* to the agreement and implication of such Section 106 obligations. Local business and residential organisations are best placed to advise priorities. As a part of this, it would be essential that local businesses are compensated for losses arising from disruptive developments. This could be "in kind" compensation such as a waive of license fees (for tables and chairs) and suchlike.

Within 11.4, "WeAreWaterloo" is spelt without spaces. It would be appreciated if this could be amended.

Policy PN1 I outlines that Greenways are "being created". At present, WeAreWaterloo is delivering "Waterloo Greenways" as a part of the recently adopted South Bank and Waterloo Neighbourhood plan, and have been awarded Community Infrastructure Levy funding from LBL to support this project. We would suggest that the wording is changed from creation to emerging, and are pleased and welcoming of LBL's support in this project.

Policy T10 covers connectivity equipment, but makes no specific references to telephone boxes. We are keen to ensure that policy legislation ensures that no further telephone boxes are granted where there is a clear lack of requirement. As an extension to this, it is vital that existing telephone boxes are granted a change of use into useful community spaces and hubs (such as libraries, art galleries, defibrillators etc). At present, there is a clear and visceral lack of purpose for such telephone boxes as there has been for the last 20 years. A reimagination and support in local planning policy to the attitude currently expressed towards telephone boxes would significantly enhance the public realm, borough wide.

Please do not hesitate to contact me to clarify any of the comments made in this representation.

Yours faithfully,

Natalie Raben
Chief Executive
WeAreWaterloo