

Pre-Submission Publication Representation Form



Ref: **R031** (for official use only)

Name of the document (DPD) to which this representation relates:

Draft Revised Lambeth Local Plan Proposed Submission
Version January 2020 (DRLLP PSV Jan 2020) and associated
Proposed Changes to the Policies Map January 2020 (PCPM
Jan 2020)

Please return to: localplan@lambeth.gov.uk

or by post: Planning Policy Team, London Borough of Lambeth, PO Box 734 Winchester SO23 5DG

by 11pm on 13th March 2020.

Please read the **Guidance Note and Privacy Notice** attached to this form before completing the representation form or submitting your comments

This form has two parts –

Part A – Personal details (please see applicable privacy notices in Section 5 of the guidance note)

Part B – Your representation(s). Please fill in a separate sheet for each part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you wish to make a representation about.

Part A

1. Personal details*

2. Agent's details (if applicable)

* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title	MARLIN APARTMENTS	
First name	CIO AGENT	JEFF
Last name		FIELD
Job title†		PLANNING CONSULTANT
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Part B – please use a separate sheet for each representation

3. To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? (Identify specific reference if possible)

Paragraph no. Policy no. Policies Map

please refer to submitted covering letter.

4. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is:

(please tick)

4.1 Legally compliant

Yes

No

4.2 Sound^

Yes

No

4.3 Complies with the Duty to co-operate

Yes

No

Please refer to submitted covering letter.

^ The considerations in relation to being 'sound' are explained in the notes at the back of this form. If

you have ticked 'No' to 4.2, please continue to Q5. Otherwise please go to Q6.

5. Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is unsound because it is not:

(please tick)

5.1 Positively prepared

5.2 Justified

5.3 Effective

5.4 Consistent with national policy

Please refer to submitted covering letter.

(Please tick only one option. A separate form should be used if you wish to raise more than one concern.)

6. Please give details of why you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible

If you wish to support the legal compliance or soundness of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 or their compliance with the duty to co-operate, please also use this box to set out your comments and then go to Q9.

Please refer to submitted covering letter.

(if required continue on the additional comments page attached)

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7. Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound, having regard to the test you have identified in Q5 above where this relates to soundness. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.) You will need to say why this change will make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified in Q3 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of this part of policy or text. Please be as precise as possible.

(if required continue on the additional comments page attached)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change to the DRLLP PSV Jan 2020 or associated PCPM Jan 2020, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination

Yes I do wish to participate at the oral examination

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

If you have selected 'No', your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(if required continue on the additional comments page attached)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

10. Please tick relevant boxes if you require notification of any of the following to your address stated in Part A:

That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination

The publication of the inspector's recommendations following the independent examination

The adoption of the Revised Lambeth Local Plan and Policies Map.

Signature



Date

13 | 03 | 2020

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13 March 2020

Dear Sirs,

Representations on behalf of Marlin Apartments Ltd to the Draft Revised Lambeth Local Plan Proposed Submission Version 2020 (Regulation 19 Consultation)

We write to submit representations on behalf of Marlin Apartments Ltd (hereafter referred to as 'Marlin') to respond to the Council's Regulation 19 (Proposed Submission Version) consultation on the emerging Lambeth Local Plan.

Our client owns the Site at 89-96 Westminster Bridge Road. We have been engaging in pre-application discussions with the Council regarding the Site's redevelopment potential for a mixed-use scheme comprising 20 boutique style hotel rooms in addition to 6 residential units, a restaurant and ancillary uses.

Marlin operate the 218 bedroom apart-hotel at 111 Westminster Bridge Road and this Site would operate as an annex under the same management, albeit on a separate site.

These representations relate to draft Local Policy ED14 and the provision of hotel development within the Central Activities Zone ('CAZ') of Waterloo.

The Site and its Context

The Site earmarked for redevelopment is situated in the Bishops Ward of Lambeth, located on Westminster Bridge Road. The building supports 6 residential units at upper levels with retail and commercial at ground floor level.

The Site is located in an urban environment where buildings vary in scale, style and usage. The surrounding area is characterised by a variety of non-residential commercial uses.

The Site sits within the CAZ, more specifically the Lower Marsh CAZ Frontage. The Site is not within the Waterloo Opportunity Area.

It is important to highlight that the Site occupies a prominent, highly accessible location, which is ideal for the provision of new visitor accommodation. It is clear that this area is unique in Lambeth, in that it has a central London character. Lambeth North Underground Station (positioned directly opposite the Site) serves the area, as well as excellent bus connectivity (Routes 12, 148, 159, 453, C10, N109 and N155). The Site is also in close walking distance Waterloo, which provides national train links across the Country to Weymouth, Southampton, Exeter, Portsmouth, the Isle of Wight alongside several commuter services around Surrey, Hampshire and Berkshire.



Planning Policy Context

A summary of the relevant planning policy relating to the location of hotel development is set out below.

Adopted Development Plan

The Development Plan for the Site comprises the following:

- London Plan (2016, and consolidated with minor changes since 2011); and
- Lambeth Local Plan (September 2015).

Local Policy ED11 of the adopted Lambeth Local Plan (2015) seeks to;

“promote, safeguard and improve leisure, recreation, arts and cultural facilities in the borough where they meet local and wider needs, especially in the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity Areas and in town centres.

(a) Visitor attractions and major leisure and cultural activities located in the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity Areas and Brixton and Streatham major town centres will be supported. Proposals should demonstrate in a visitor management plan how the potential impacts of high volumes of visitors would be managed, including appropriate provision for short term coach parking and, if appropriate, long term coach parking on site.”

Local Policy ED12 of the adopted Lambeth Local Plan (2015) sets out that, *“Hotels, apart-hotels and other forms of visitor accommodation (C1) will be supported in the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity areas and Brixton and Streatham town centres, subject to the following considerations. Smaller scale provision will be supported elsewhere in the borough where public transport accessibility levels are ‘good’ (PTAL 4) or above, in accordance with London plan policy.*

(a) All visitor accommodation must:

- Provide appropriate off-street pick-up and set-down points for taxis and coaches;*
- Not unacceptably harm the balance and mix of uses in the area, including services for the local residential community.*

(b) All new visitor accommodation should meet the highest standards of accessibility and inclusion. At least 10 per cent of new provision should be wheelchair accessible.

(c) New visitor accommodation should be of high quality design so that it may be accredited by the National Quality Assessment Scheme.

(d) Where development proposes to modify existing visitor accommodation, the proposal will be supported only if it provides standards of accessibility and design expected of new build accommodation, subject to feasibility and viability.

(e) The loss of existing visitor accommodation will not be supported in the locations set out in this policy (the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity Areas, and Brixton and Streatham town centres). Where it is demonstrated, through at least one year’s marketing evidence, that there is no longer demand for existing visitor accommodation, change of use will be supported subject to the requirements of other development plan policies.’



Supporting text at **Paragraph 6.60** states that *“harm to the ‘balance and mix of uses in an area’ will be assessed on a site by site basis, having regard to the characteristics of an individual locality, including existing concentrations of visitor accommodation, and the nature and scale of the proposed development. Provision of a range of types of visitor accommodation in Lambeth is supported, including budget and mid-range accommodation”*.

Strategic Policy 4.5 of the London Plan (2016) states that boroughs should ensure that new visitor accommodation is in appropriate locations and that *“further intensification of provision in areas of existing concentration should be resisted, except where this will not compromise local amenity or the balance of local land uses”*.

Material Considerations

The NPPF (2019), draft New London Plan (2019) and Lambeth’s draft Revised Local Plan (2018) are also material considerations.

NPPF (2019)

The key policies relating to preparing Plans are noted below.

Paragraph 31 of the NPPF requires policies to be underpinned by relevant and up-to-date evidence. It notes *‘this should be adequate and proportionate’*.

Paragraph 35 of the NPPF sets out the criteria that Plans should meet to be considered ‘sound’:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Paragraph 48 of the NPPF states that local planning authorities may give weight to relevant policies in emerging plans according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).



The New London Plan (Intend to Publish Version) (2019)

The key policies to note are set out below:

Policy GG2 aims to create successful sustainable mixed-use places that make the best use of land.

Policy GG4 aims to ensure more homes are delivered to create a housing market that works better for all Londoners.

Policy SD4 aims to “*enhance and promote the unique international, national and London-wide roles of the CAZ, supporting the distinct offer of the Zone based on an agglomeration and rich mix of strategic as well as local uses*”.

Policy SD6 seeks to support adaptation and diversification of London’s varied town centres to promote and enhance the vitality and viability.

Policy D4 sets out design criteria in order to deliver good design.

Policy H4 details the expected approach to affordable housing.

Policy E10 encourages smaller hotel provision in areas of the CAZ outside of the Opportunity Areas, except in wholly residential streets or predominantly residential neighbourhoods. The policy directs Strategically important serviced accommodation to Opportunity Areas and defines these as being more than 20, 000 sqm in size. No definition is given for ‘smaller scale’.

Paragraph 6.10.2 notes that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum. **Paragraph 6.10.3** of the Policy notes that “*concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided*”.

Policy HC1 sets out how to manage heritage conservation assets.

Draft Revised Lambeth Local Plan Proposed Submission Version 2020 (Regulation 19 Consultation)

The key policies relating to the location of hotel development are noted below.

Policy ED14 Hotels and Other Visitor Accommodation sets out:

“In accordance with London Plan policy E10:

- a) *Outside of the Waterloo CAZ boundary and Vauxhall Opportunity Area and CAZ boundaries visitor accommodation (C1) will be supported in major and district town centres. In these locations visitor accommodation should be of an appropriate scale for the proposed location and should not unacceptably harm the balance and mix of uses in the area, including services for the local residential community. Additional visitor accommodation outside town centres will not be permitted.*
- b) *Additional visitor accommodation (C1) will be supported in Vauxhall outside of wholly residential streets or predominately residential neighbourhoods subject to the following area specific requirements:*

- i) Strategically important hotels should be located in the parts of the Opportunity Area that are within the CAZ. Strategically important hotels and other forms of visitor accommodation will be supported in this location where they are part of a mixed-use development, do not result in the loss of office space or other strategic functions of the CAZ and do not intensify the provision of serviced accommodation in a way that causes unacceptable harm to local amenity or the balance of local land uses.*
 - ii) In the rest of the Opportunity Area and in the parts of the CAZ that are not within the Opportunity Area, visitor accommodation of up to 100 rooms will be supported where they are part of a mixed-use development, do not result in the loss of office space or other strategic functions of the CAZ and do not intensify the provision of serviced accommodation in a way that causes unacceptable harm to local amenity or the balance of local land uses.*
- c) No additional visitor accommodation (C1) will be permitted in Waterloo within the boundary of the Central Activities Zone (CAZ).*
- d) Proposals to extend existing visitor accommodation will only be supported in the locations set out above subject to the other requirements of this policy being met.*
- e) In all locations set out above, proposals for visitor accommodation (C1) will be acceptable only where it can be demonstrated that the development does not compromise a site's capacity to meet the need for conventional dwellings, especially affordable family homes.*
- f) Proposals for new or extended visitor accommodation should include an assessment of impact on neighbouring residential amenity, including cumulative impact taking account of existing hotels nearby. Where necessary, measures to mitigate harm to residential amenity will be secured through planning obligations.*
- g) Proposals for new or extended visitor accommodation should include a visitor management plan that assesses the impacts of additional visitor numbers on the local area, such as increased demand on local transport facilities and on public services to manage and maintain the public realm; and sets out how these impacts will be managed. Planning obligations will be sought to mitigate any identified impacts.*
- h) All new visitor accommodation should meet the highest standards of accessibility and inclusion, in accordance with the requirements set out in London Plan policy E10. Applicants should submit an Inclusive Design Statement with their proposals.*
- i) All new visitor accommodation should make a positive contribution to townscape, should be of a high quality design and be designed to meet relevant quality standards so that it may be accredited by the National Quality Assessment Scheme.*
- j) All new hotels will be expected to provide facilities for business visitors, including meeting rooms and workspaces. The potential for business and leisure facilities within hotels to be made available for public use in locations where there is an identified shortage of provision will be explored. Public use of hotel facilities will be secured through planning obligations.*
- k) Provision of pick-up and set-down points for taxis and coaches should be appropriate to the site and development, as demonstrated through a transport assessment, and preferably be provided on site.*
- l) Where it is demonstrated, through at least one year's marketing evidence, that there is no longer demand for existing visitor accommodation, change of use will be supported subject to the requirements of other development plan policies.*



The London Borough of Lambeth Topic Paper 5: Visitor Accommodation (January, 2020)

The key points to note are as follows:

- The draft London Plan estimates that London will need an additional 58,000 bedrooms of serviced visitor accommodation between 2015 and 2041. The evidence underpinning this latest London-wide projection suggests Lambeth would need to see a net increase in supply of 3,368 rooms between 2015 and 2041.
- There is a very strong pipeline of serviced accommodation in the Borough and, when including the consented pipeline together with current planning applications, the Report concludes that there is no shortage of supply to meet anticipated demand.
- There is a concentration of new hotels and serviced rooms, namely in Waterloo and Vauxhall. **Policy E14** seeks to promote new visitor accommodation in other areas to promote other land uses and manage the impact of hotels on local areas. We are mixed-use and can demonstrate won't negatively affect area.
- The growth in Lambeth's serviced visitor accommodation has been concentrated in Waterloo. **Paragraph 2.13** notes that the whole of the Waterloo area up to the boundary of the CAZ contained 3,524 rooms (62% of total serviced rooms in the borough). The majority of these rooms are hotel rooms although the area does have aparthotel and guesthouse rooms. 748 of the 3,524 rooms have been completed since April 2015. There is also a strong pipeline of further serviced rooms (see map 2). As of March 2019, there were 130 rooms under construction across 3 establishments and two unimplemented permissions providing a further 35 rooms each. Therefore the total development pipeline for Waterloo was 200 rooms, with 161 of these located in the Opportunity Area.
- Regarding the scale of visitor accommodation in the Borough, **Paragraph 2.21** notes that the median size will rise from 61.5 to 80 rooms (once the pipeline is implemented).
- **Paragraph 3.1** clarifies that the draft policy seeks to restrict further hotel development in Waterloo, to ensure a sufficient quantum of other priority uses can come forward in the Opportunity Area, particularly housing, offices and workspace.
- With regard to scale, **Paragraph 3.7** notes that regard will be had to the location of the site and local circumstances. Balance and mix of uses will also be assessed on a site by site basis having regard to the characteristics of an individual locality, including existing concentrations of visitor accommodation, and the nature and scale of the proposed development.
- The draft policy prevents visitor accommodation in this location to maintain the current mix and balance of land uses and prevent harm to this balance as a result of a future over-domination by one type of use. **Paragraph 3.13** specifies that Waterloo, due to its location in the CAZ and Opportunity Area, performs a number of strategic functions. The Report considers that Waterloo has a strong stock of hotels with a strong pipeline of new visitor accommodation. The Paragraph notes that the policy is also to ensure the need for other uses, particularly housing, offices and workspace, can be met.

GLA Working Paper 88 – Projections of Demand and Supply for Visitor Accommodation in London to 2050 (2017)

The key findings are noted as follows:

- Projects that, based on demand, London will need to add an additional 58,140 rooms to the serviced accommodation supply between 2015 and 2041, at an average of 2,236 per annum. This is based on an anticipated increase in visitor nights from 138.4 million in 2015 to 196.4 million by 2041.
- In terms of distribution of demand across boroughs, Lambeth is projected to require a net increase of 3,051 rooms between 2015 and 2041.

Hotels and Other Visitor Accommodation in Lambeth 2018/2019 (March, 2019)

The key findings are noted as follows:

- **Paragraph 2.2** states that in terms of serviced visitor accommodation, as of March 2019, there are 30 hotels, 7 B&Bs/guesthouses and 5 visitor accommodation hostels in Lambeth. The total number of rooms are 5,867. 60% of these rooms are in the Bishops ward.
- In terms of completions, approvals and development pipeline, 181 rooms were completed, 811 rooms were approved and a development pipeline of 1,354 rooms.
- **Paragraph 4.4** notes that 181 net additional serviced rooms were completed in Lambeth between April 2018 and March 2019. In total, 1,190 net additional service rooms have been completed since March 2015.
- **Paragraph 4.5** states that there were a further 1,354 serviced rooms in the planning pipeline as of March 2019 - the majority of these (77%) were unimplemented. If all of the unimplemented and under construction permissions were to be completed, this would bring the total number of net additional serviced rooms in the borough to 544 rooms more than the indicative demand estimate for Lambeth for the whole period 2015 to 2036.

The Hotel Needs Case

Draft Policy ED14 seeks to impose a blanket restriction to Use Class C1 development within the Waterloo area of the CAZ. This directly conflicts with the aspirations of the adopted and draft New London Plan, which supports and encourages the principle of hotel use in this location. It does not seek to restrict hotel development on the basis of the supply position, as conversely the draft Local Plan promotes.

The below sets out the need for such accommodation in the context of London and more specifically, Lambeth.

Demand for Visitor Accommodation in London

The demand for hotel accommodation in key cities such as London remains. JLL state that despite geopolitical issues, terrorism and economic volatility the tourism industry has shown resilience and travel remains on the increase. JLL predicts that the movement of international travellers will grow by 4% annually over the next ten years, with London remaining the key desired investment destination (Hotel Investment Outlook Research, 2017).

Strategic policy recognises that London is an attractive global destination. Adopted London Plan Policy 4.5 provides strategic support for the provision of new hotel facilities within London, which will seek to achieve 40,000 net additional hotel bedrooms by 2036. The objective of the policy is to improve the quality, variety and distribution of visitor accommodation and facilities. These aspirations are also echoed in draft New London Plan Policy E10.

Need for Tourist Accommodation in Lambeth

The existing concentration and pipeline of visitor accommodation is set out in Lambeth's Hotels and Visitor Accommodation Study (2018/19). It notes that as of March 2019, there are a total of 5,867 serviced visitor rooms in Lambeth. The majority of this accommodation is situated in the north of the Borough, with 60% within Bishop's Ward where 89-96 Westminster Bridge Road is located. This translates to a total of 3,317 rooms.

The GLA's Visitor Accommodation Study (2017) asserts that demand for London accommodation will increase to circa 196 million overnight stays by 2041. As a result, it is estimated that a net increase of 58,140

rooms on the 2015 rooms supply is required. According to a distributed demand projection by Borough, an increase of 3,051 rooms from the 2015 rooms is needed in Lambeth. Whilst the Borough wide target is an indicative figure indicating the demand projection based on the historic share of London supply change, it is a useful benchmark. We consider that in reality, owing to the progress of (and planned) improvements in infrastructure south of the Thames, the projections for the Borough of Lambeth are conservative in their forecast.

Lambeth's Hotels and Visitor Accommodation Study (2018/19) states that there are 1,354 serviced rooms in the planning pipeline - the majority of these (77%) are unimplemented. If all of the unimplemented and under construction permissions were to be completed, this would go some way to meeting the Borough requirement. It is emphasised that it is likely that not all of these permissions will come forward and therefore the case for hotel need still remains.

Whilst there are a number of hotels near to the Site and within the Ward, the scale and nature of operation is unique. The hotel at 20 rooms is a very minor addition to the Bishop's Ward and whilst there are other hotels located in the vicinity, the mixed character of the area and the co-location with the hotel at 111 Westminster Bridge Road mean that the proposals would not lead to an overconcentration of visitor accommodation; the slight increase in bed spaces will not contribute significantly enough to the existing concentration and pipeline of visitor accommodation in the Borough. The policy, however, prevents any hotel development whatsoever in the area.

This in turn also prohibits the employment benefits that such developments would be expected to generate both in full time equivalent personnel, support functions and indirect jobs along the supply chain. This would contribute to the immediate area commercially alongside increasing the incremental tourism spending which would improve the overall socio-economic prosperity for the Borough.

Ultimately, Policy ED14 is too stringent in its approach to the location of visitor accommodation. The justification provided in the supporting text for the Policy notes that this approach is because of "*rapid growth and concentration of hotels and the need to support other functions such as office and residential*". However, the Policy doesn't account for a mixed-use scheme in this location. The reading of the Policy would render this form of development unacceptable in terms of land use principle.

The matter of the balance and mix of uses in the area is discussed below.

Balance and Mix of Uses in the Area

In terms of land use, it is clear that the Site is positioned within an area which is characterised by mixed use higher density development, which is appropriate to its location in Central London. This is reflected in its designation within the Lower Marsh CAZ Frontage. The building is located within a triangular block which is bounded to the north east by Westminster Bridge Road, to the east by Kennington Road, to the south west by Hercules Road, and to the west by rail infrastructure (see **Figure 1** below). With the exception of some terraced housing positioned at the very south of this block along Hercules Road (where the setting is more residential), it is apparent that this area is characterised by a variety of non-residential commercial uses, including visitor accommodation.

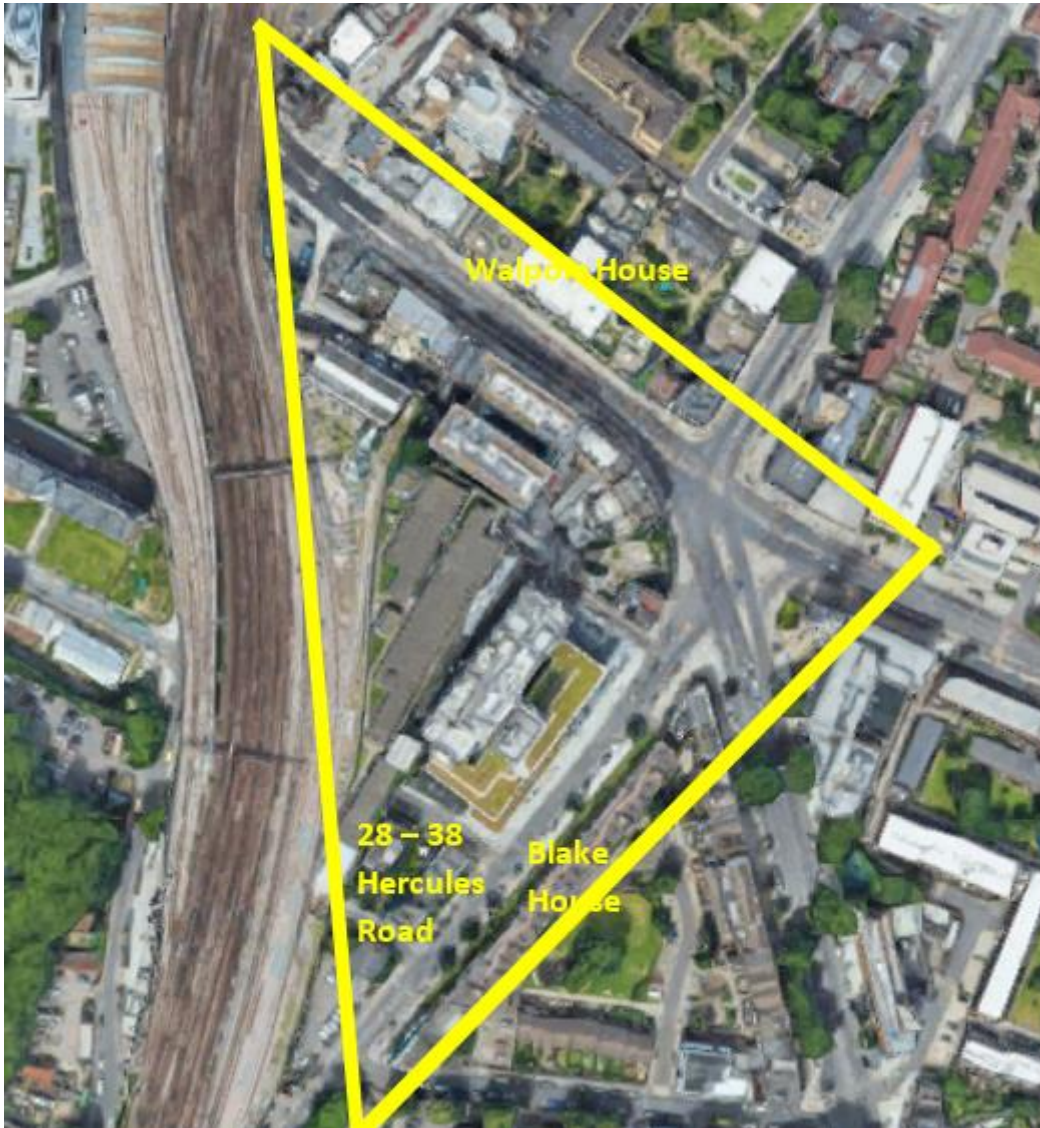


Figure 1: The Immediate Locale – The ‘Triangular’ Block

The only residential premises in the immediate vicinity are at Walpole House (to the north side of Westminister Bridge Road), and terraced properties to the west side of Hercules Road and Blake House to the east of Blake House. Each are considered in turn:

- **Walpole House** – This residential block is positioned to the north west of the Site on the northern side of Westminister Bridge Road, a busy arterial route characterised by heavy private vehicle traffic, buses and taxis (as well as ambulances travelling to and from St Thomas’ hospital 24 hours a day. Moreover, Lambeth North Station, located in very close proximity to both Walpole House and the Site, has services running 24 hours a day. As a result, providing a small number of hotel rooms together with residential properties is not considered to create any negative impacts in terms of disturbance on the occupiers of Walpole House.



- **Blake House and nos 28 – 38 Hercules Road** – These properties are positioned further to the south of the Site in a predominantly residential area. Whilst there is the Hercules pub the junction of Hercules Road and Kennington Road, and some ground floor café, restaurant and bar accommodation within the Park Plaza Hotel, there are no significant attractions beyond this to the south or on the eastern side of Hercules Road to attract visitors using the apart-hotels. As such, it is considered that there would be no negative impacts in terms of disturbance on the occupiers of either Blake House and nos 28 – 38 Hercules Road.

This therefore depicts that the triangular block in which the Site is located is characterised by commercial uses including visitor accommodation. It is distinct from the surrounding inner London residential hinterlands which largely characterise the areas to the east of Hercules Road and Kennington Road, and to the north of Westminster Bridge Road. The proposal seeks to reprovide, to a greater degree, the restaurant use that currently exists at ground floor level within the scheme. There are also six high-quality residential units proposed, alongside the apart-hotel rooms. The mixed-use nature of the proposal is entirely consistent with the pattern of uses in the vicinity and the CAZ frontage location.

Closings

The NPPF requires policies to be underpinned by relevant and up-to-date evidence. Paragraph 35 of the NPPF specifies that, in order for Plans to be considered sound, they need to be justified. It is clear from draft New London Plan Policies SD4 and E10 that there remains an increasing appetite for hotel accommodation in London. This strategic policy context recognises that tourism is a key driver of the economy within the CAZ and encourages the use in these locations, however this does not translate in the wording and stringency of draft Policy ED14 regarding the Waterloo area. There remains a conflict between strategic and local policy aspirations.

Small scale hotel development could provide significant benefits in this location, including the delivery of other supporting land uses – the policy as drafted prevents this. Indeed, it restricts a unique opportunity to provide a mixed use proposal, which would bring advantages including the restoration of an old listed building. The quality of accommodation and the surrounding built environment would actually improve. It is clear that National and Strategic policy supports the efficient use of previously developed land in such a location. There is therefore a question as to whether a threshold of acceptable hotel bedspaces should be introduced into draft Policy ED14, rather than limiting an entire use class from the Waterloo CAZ. We also request that the triangular block referenced above is excluded from the policy restriction.

I trust that the above provides informative comments to the current consultation. I would be grateful if you could please confirm safe receipt of this representation and for the above comments to be considered.

Yours sincerely

A handwritten signature in blue ink that reads 'Jeff Field'.

Jeff Field
Head of London Planning
National Development and Planning