

From: [Michael Ball](#)
To: [Local Plan](#)
Cc: [Jeremy Cross](#); [M Evers](#)
Subject: DRLLP objections on soundness re PN1 Waterloo
Date: 13 March 2020 02:59:11

Dear Local Plan team

Re: 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)

Waterloo Community Development Group has been the residential community's planning group since 1972. We are a registered charity and a company limited by guarantee.

We wish to make the following representations regarding Policy PN1, which has been completely re-written, and which we consider unsound, being neither positively prepared, justified nor effective. We have proposed a number of changes, and would like to appear at the Oral part of the Examination.

The Local Plan sets out to achieve sustainable development through pursuing three overall overarching objectives – economic, social and environmental. Waterloo is a relatively unique area in the UK: there are only half a dozen major transport nodes in the UK's biggest city which sit cheek by jowl with local residential communities, and it is only just over 20 years since national planning policy accepted that this was a positive combination – in the preceding 100 years of local government and emerging town planning the emphasis had been on separating such land uses and dispersing such residential communities. But Waterloo is unique in the UK as having not only a major transport node cheek by jowl with a residential community but also accommodating Europe's largest arts complex, and is emerging as one of the UK's most visited hotspots, with 30m visitors annually (10% of all London's visitors). And to top it all off there is one of the nation's main teaching hospitals.

The increasing challenge for Waterloo over the past 20 years has been managing the challenge of an area virtually everybody wants to be a part of whilst ensuring the environment and sufficient land to support a sustainable residential community and its needs, such as schools and health centres and open space. Prior to the 1980s Waterloo was in massive decline as a result of the dispersal policies referred to above, with residents leaving and local schools and shops closing, and an increasing number of office developments. At that time over 60% of housing was social housing. That proportion has declined to around 25% today, even as the overall amount of housing has increased by around 40%, part of a massive 'rediscovery' of Waterloo and the South Bank as very attractive places with huge geographical advantages (being so close to both Westminster and the City, for example).

The challenge now is to maintain the balances of uses needed to sustain a local residential community, which are the essential kernel in ensuring that Waterloo and the South Bank remains such an attractive place where good growth can prosper. A simple example are the open spaces: Jubilee Gardens is now probably the most visited open space in the country per blade of grass (it has the same number of visitors as Regent's Park, a hundred times the size), but was a flat boggy dog toilet for 20 years until local stakeholders got together and formed a local Trust to create and maintain this amazing space without public funding, one of the jewels of the South Bank. Waterloo's most central open space is the Millennium Green – which was transformed from a burnt out shack and wasteland by another local community Trust established by residents in 2000, and is now maintained without public funding by another local Trust, Bankside Open Spaces Trust. Major improvements to Waterloo's other open spaces were

led by the local community at Archbishops Park, Hatfields, and Ufford Street Recreation Space. And another major open space on the edge of Waterloo (but in Southwark), Geraldine Harmsworth Park, was saved from development (by the Imperial War Museum) in the 1970s by a concerted campaign led by local residents. All these spaces are critical to making Waterloo such an attractive neighbourhood, and all have been saved, transformed and maintained by local residents and other local stakeholders, sometimes in the teeth of the local planning authorities.

In short, a residential community is the least unique thing about Waterloo, but it's sustainability is absolutely necessary to ensure the success of this remarkable neighbourhood. However, residential land uses – and especially affordable residential – and community uses are less attractive to would-be developers than many other uses, including visitor attractions, hotels, student accommodation, and major offices. There is no need to attract developers for such uses, they are already investing heavily here, and have taken most of the vacant sites in recent years. Land for existing and potential residential uses, and especially affordable residential uses, need the strongest planning protections possible.

That should be the critical purpose of policy PN1, to achieve sustainable development through the overarching social, economic and environmental objectives by protecting the existing community and growing the residential community and its social infrastructure. Unfortunately the DRLLP does not recognise this and policy PN1 doesn't achieve it. For example, it states

“Affordable housing is a priority in Waterloo, as in all parts of Lambeth” (11.7)

This is simply not the case. Having lost a much greater proportion of its social housing than elsewhere in Lambeth, and having lost to other uses numerous sites once identified for housing, and having seen elements of affordable being delivered off-site beyond Waterloo (e.g. Shell Centre/ South Bank Place developed much of its affordable housing in Kennington) in Waterloo securing additional affordable housing is probably the highest priority of all. Policy PN1 does not reflect this, but instead sees residential as just another land use it wishes to promote along with additional leisure and visitor attractions, major offices, Medtech and retail clusters. We object to the draft policy and commentary which needs to be fundamentally re-written to acknowledge the points made above.

On specific points/ objections:

11.1 The target numbers of homes and jobs remains the same as first set for the Opportunity Area in 2007, despite the fact that since then over 800 homes have been delivered: how come?

11.4 Firstly Oasis are a significant stakeholder which should be mentioned in this paragraph. Secondly, the South Bank Partnership manifesto 2018 does not fully reflect the residential community's aspirations, and they did not formally endorse the Manifesto. It would be acceptable to add the word “largely” after “south Bank Partnership” and before “reflects the shared ambitions...”

11.5 The leisure centre and tower of market housing proposed at Doon Street was permitted in the teeth of strong local opposition and against the recommendations of an Inspector following a public inquiry in 2008. Over the intervening 12 years the landowner/ developer has failed to implement the scheme, compounding its failure to develop it since it acquiring it cheaply from the GLC in 1984 for social housing. There is no evidence that the scheme will ever be delivered, or that Coin St has the capacity to deliver it or secure a development partner to deliver it. There is ample evidence that owners Coin St intend to continue using the site as a cash cow with temporary permissions for visitor attractions and car parking. The covenants placed on the site

by the GLC, protecting the site for social housing and stopping commercial development, finally run out in 2024, whereupon Coin St will have an even greater incentive not to deliver the scheme. This reference should therefore be removed. Aspirations to develop the Johanna School site should be included.

11.7 Permission at 202 Lambeth Rd is for student accommodation, not housing. The vacant housing sites owned by Coin St (Princes Wharf, Gabriel's Wharf, Doon St and Cornwall Rd/Stamford St) should be referred to in this list, as should the Royal St sites.

11.8 + 11.10 We do not want to see any further encouragement to the visitor economy. The South Bank has 30 million visitors already and is in danger of becoming an unpleasant space due to the congestion and other impacts created by so many tourists, which can only be managed and mitigated to a lesser degree.

11.11 Car trips should decline rapidly if the air quality is to improve at all.

11.12 Reference to the Waterloo & South Bank Public Realm Framework 2019 should be deleted. This was a document produced without sufficient evidence or consultation, and was rejected by all stakeholders in Waterloo in an unusually united front. It is riddled with errors, misdirects priorities, and clearly clashes with the DRLLP on a number of policies, for example the Framework proposes that the Jubilee Gardens extension should have a fundamentally different design to the rest of the Gardens, whereas the DRLLP states that it should be contiguous and seamless.

Policy PN1:

b) what are the "long term place-making objectives"?

c) i) what does 'original' mean here? This needs clarifying.

c) ii) why should it be policy to require 30% of units to be in A3 use? Virtually all of The Cut has fallen to A3 uses, as has a significant part of Lower Marsh. This use doesn't need protection or encouragement.

g) the public realm needs improving across the neighbourhood, not simply in the touristy areas, and should be based on residents' needs for space for recreation, sport and play

h) what other sites are available for open space? We are not aware of any. The policy should encourage green open spaces on terraces and roofs, provided that they are open to the public.

h) vi) Not clear what arch is being referred to. The arch on the footpath is wrecked by the appalling cheap extension of Ping Pong across it; the road arch would always retain views across the Gardens, no matter where the proposed LPO arts buildings is sited on the HCP

h) final para: the existing toilets are on the HCP, not Jubilee Gardens.

i) coaches should be discouraged in the strongest possible manner

k) the residential community does not support the reconfiguration for the Imax roundabout, and there is insufficient rationale for this. We completely reject the proposal to develop a tall building on the Imax site (Location W3, Annex 11) which is entirely unjustified in the Topic Paper.

Yours sincerely

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