

Pre-Submission Publication Representation Form



Ref: **R047**
(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 | MR | |
| First name | DOMINIQUE | |
| Last name | MIREPOIX | |
| Job title [†] | | |
| Organisation [†] | DP9 LTD | |
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DP9.CO.UK

Pre-Submission Publication Representation Form

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

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

^ 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

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5.3 Effective

5.4 Consistent with national policy

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

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Please see representations 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.

Please see representations letter.

(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

11 / 3 / 2020

Please use this section for any additional/continued comments

DP5368/DGM/HRW/DM

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13 March 2020

Dear Sir / Madam,

REPRESENTATIONS TO THE DRAFT REVISED LAMBETH LOCAL PLAN SUBMISSIONS VERSION JANUARY 2020

We write on behalf of our client, PPHE Hotel Group, to submit representations to the Draft Revised Lambeth Local Plan and its supporting evidence base.

PPHE Hotel Group owns, leases, develops, manages and franchises primarily full service four-star deluxe and contemporary lifestyle hotels in major gateway cities and regional centres primarily in Europe and the UK. It is a leading hotel operator, operating 39 hotels across the world. Park Plaza currently operate four hotels in the London Borough of Lambeth: Park Plaza Westminster Bridge, Park Plaza County Hall, Park Plaza London Waterloo and Park Plaza London Riverbank.

PPHE Hotel Group is seeking to bring forward a mixed-use development in Lambeth, on a site south of Waterloo Station. The site is located at 79-87 Westminster Bridge Road.

With such a central site that has been historically underdeveloped or left vacant, a new mixed-use development would significantly improve the site as well as the surrounding area.

It is within this context that we welcome the opportunity to make representations on the Draft Revised Lambeth Local Plan and we look forward to continued engagement throughout the Local Plan process.

This letter outlines a number of key comments and observations which we would like to record on the draft of the Lambeth Local Plan, mainly relating to the policies relevant to hotel use in and around the area of Westminster Bridge Road.

We are supportive of the overarching ambitions set out in policy D1, specifically encouraging and supporting sustainable development that enhances the local distinctiveness of neighbourhoods, specifically:

- The growth and development within the borough through the regeneration of the Waterloo and South Bank area;



- The centre-specific approach to managing the mix of uses in town centres; and
- Supporting various initiatives such as neighbourhood plans, town centre partnerships, Business Improvement Districts, similar business networks and business-led and other neighbourhood management schemes in order to promote centres, assist in attracting inward investment, and co-ordinate and manage improvements to the public realm.

We welcome Lambeth's approach to sustainable development set out in part A of draft policy D2 which states that *"when considering planning proposals, the council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Lambeth."*

Policy PN1 Waterloo and South Bank

We are strongly supportive of the overarching objectives to enhance and support Waterloo and South Bank's role as a key player in the central London and Lambeth economy, including its role as a pre-eminent international, domestic and local tourist, leisure, retail and entertainment area, as well as a major location for offices, creative and digital industries, healthcare, MedTech and life sciences businesses and higher education.

In principle, we continue to be supportive of the growth of the area's role as a business district by supporting office development and affordable workspace that provides a range of unit sizes, can be subdivided to encourage flexible use and co-working and workspace suitable for small and medium enterprises and creative and digital industries. Whilst we agree that the area should continue to provide and protect a mixture of office uses, in the right location, the Council should consider other complementary non-office uses to ensure the most effective use of land, in accordance with paragraph 117 of the NPPF.

PPHE Hotel Group supports the optimisation of the Lower Marsh/The Cut/Leake Street Special Policy Area's potential for a full range of central London and town centre activities, including part D of policy PN1, which encourages flexible use and co-working and workspace suitable for small and medium enterprises and creative and digital industries.

The principles set out in part F of policy PN1 are supported, which aims to promote the *"expansion of creative, arts and cultural activities throughout Waterloo and enhancing the South Bank in its role as an international cultural and leisure centre and a London tourist destination through supporting the development of arts and cultural facilities, associated and supporting uses."*

Policy ED14 Hotels and other visitor accommodation

We are strongly supportive of point 6.99 of draft policy ED14, which states *"The provision of a range of types of visitor accommodation in Lambeth is supported, including budget and mid-range accommodation and accommodation for business travellers."*

We do not agree with part c which states that *"no additional visitor accommodation (C1) will be permitted in Waterloo within the boundary of the Central Activities Zone (CAZ)."* This is too prescriptive, and we believe that each site should be judged on its own merits and we query the rationale and evidence base around this policy.

For example, there are currently 23 hotels within a 0.5-mile radius of the subject site referenced above, totalling 4,320 keys. What is clear is that the hotel market is dominated by the four star and budget hotel sectors. There are five budget hotels within a 0.5-mile radius of the proposed site comprising a total 1,220 keys. The most notable being the Premier Inn County Hall (316 keys) and the Hampton by Hilton Waterloo (297 keys). The closest budget hotel to the subject site is the Point A, which comprises 94 keys. The four-star sector dominates the market comprising approximately 60% of total room stock. The largest hotel is the Park Plaza Westminster Bridge which comprises 1,019 keys (circa 25% of all room stock in the market).



Whilst there are a number of hotels in the area offering budget and four-star specification, we believe there is still demand for hotels that offer compact luxury, with high quality rooms and interactive public areas with a high-quality retail offering which differentiates the product from the market. There is currently nothing in the market to fill this demand gap.

In addition to the existing supply, there are nine hotels in the development pipeline within a 0.5 mile radius of the subject. As is evidenced, the majority of these developments are scheduled to be within the budget sector. This is likely due to the demand drivers of the market and location of available sites. As aforementioned, the majority of existing room supply is in the four-star sector as such an increase in room supply in the budget sector will help capture demand at a lower pricing level.

The compact luxury/ select service concept is an emerging trend in the market with companies such as CitizenM providing accommodation needs for the modern-day traveller. This type of hotel works best when situated in close proximity to transport links, as such the subject site being situated opposite Lambeth North station and within walking distance of Waterloo Railway Station offers an ideal location. Given the emergence of the South Bank over the last 15 years with substantial office and leisure development, the hotel pipeline is disappointing with very few keys scheduled to enter the market to accommodate for the increased demand. Without this additional demand, hotel customers will have to travel to neighbouring boroughs which will harm local shops and restaurants

Whilst we understand that the provision of more hotels in Waterloo may increase the amount of hotel accommodation in this part of the Borough, we do not believe that this will result in tangible harm to the balance of mix of uses in this part of the Borough. Given the surrounding uses, including tourist destinations, restaurants, pubs and other businesses, as well as the busy character of the adjacent Lambeth Road, the hotel would not harm the prevailing character but instead help to support the character of the area.

PPHE Hotel Group recognises the need to protect the amenity of the area and the importance of ensuring an appropriate mix and balance of uses within the borough but suggest that further flexibility should be provided under draft policy ED14 when considering visitor accommodation in the area immediately south and south-east of Waterloo Station.

Policy ED15 Employment and training

PPHE Hotel Group strongly support the continuation of policy ED15, *“the council will support employment and training schemes to maximise local employment opportunities and help address skills deficits in the local population.”*

Policy ED1 Offices (B1a)

Part F of draft policy ED1 refers to the potential scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises, including co-working spaces. PPHE Hotel Group is strongly supportive of co-working spaces and the opportunities they bring in terms of collaboration and knowledge sharing. We suggest that draft policy ED1 addresses ways in which co-working spaces can be incorporated into predominantly non-office use developments, to allow different land uses to complement each other and in order to support mixed-use developments as set out in Policy 4.3 of the London Plan.

Policy Q26 Tall buildings

We support draft policy Q26, which states that tall buildings will be supported where it *“will not adversely impact on strategic or local views,” “design excellence is achieved,” “the proposal makes a positive contribution to public realm and townscape including at street level”* and *“where proposed near existing tall building groups, proposals*



should follow the established principles of group composition such as noticeable stepping down in height around cluster edges.”

Policy Q7 Urban design: new development

We welcome the continued encouragement of quality design for new development in Lambeth. Draft policy Q7 refers to bulk, scale, siting, building line and orientation, stating that *“where the urban context is changing, the proposed development should also contribute towards the intended future character of the area,”* which we strongly support.

Policy Q8 Design quality: construction detailing

We also support draft policy Q8, which states that the council will *“seek construction detailing that is unified, visually attractive, robust and maintenance free.”*

We trust that our representations will be fully considered and taken into account as the preparation of the Lambeth Local Plan continues. If you require any clarification on any matters, or wish to discuss our representations further, please do not hesitate to contact Hannah Willcock or Dominique Mirepoix of this office.

Yours Faithfully,

DP9 Ltd.