

Draft Revised Lambeth Local Plan October 2018

Topic Paper 2 - Hotels and other visitor accommodation

October 2018


Lambeth

Contents

Executive Summary	1
Introduction	3
Overview of policy context.....	4
National Planning Policy Framework 2018.....	4
London Plan.....	4
Evidence base.....	6
GLA Working Paper 88 – Projections of demand and supply for visitor accommodation in London to 2050 (2017).....	6
Lambeth Hotels and Other Visitor Accommodation in Lambeth 2018.....	6
Issues consultation 2017	8
Draft Revised Lambeth Local Plan	9

Executive Summary

This topic paper explains the rationale behind the proposed policy approach for hotel and visitor accommodation in the Draft Revised Lambeth Local Plan October 2018.

Lambeth has seen a recent increase in the amount of visitor accommodation coming forward in the borough, likely due to Lambeth's proximity to nationally renowned cultural attractions such as those within the Southbank, and partly because of the increasing popularity of local attractions within the borough, such as Brixton. In March 2015 there were 4,434 serviced rooms in Lambeth and since April 2015 1,009 net additional serviced rooms have been completed. As of March 2018, there were 5,479 serviced rooms in Lambeth and another 1,001 rooms in the development pipeline (under construction or unimplemented planning permissions).

There are concentrations of existing and new hotel rooms in the Waterloo and Vauxhall Opportunity Areas. As of March 2018, Bishop's ward, which includes the whole of the Waterloo Opportunity Area, contains the highest number of serviced rooms in the borough with a total of 3,518 rooms (68% of the total number of serviced rooms in Lambeth). There is a further 234 rooms under construction and an unimplemented planning permission for another 40 rooms. In the Vauxhall Opportunity Area there were 594 serviced rooms under construction in March 2018.

Serviced visitor accommodation is supplemented by other forms of visitor accommodation which have the potential to help meet the demand for additional serviced accommodation identified by the GLA. This includes student rooms available to visitors during vacation periods and short-term lets such as Airbnb. The use of Airbnb in Lambeth appears to have increased significantly. Data from Airdna suggests that there were only 10 Airbnb rentals listed in 2010 whilst in May 2018 Airbnb database data shows that on 1st January 2018 Airbnb recorded 4,300 active host listings in Lambeth, which is the 9th highest number of listings for all London boroughs.

The revised Lambeth Local Plan needs to support hotels and other forms of visitor accommodation while striking the right balance with other much needed uses such as housing and offices and to be in general conformity with the emerging new London Plan. Policy E10 of the Draft London Plan 2017 (as amended August 2018) states that London's visitor economy and associated employment should be strengthened and a sufficient supply and range of serviced accommodation for business visitors should be maintained. The policy states that within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods, and subject to the impact on office space and other strategic functions. In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London.

Policy ED14 of the Draft Revised Lambeth Local Plan seeks to ensure that Lambeth contributes to the need for additional visitor accommodation in London whilst also ensuring that new developments do not result in concentrations of visitor accommodation which can have a negative impact on local areas. The policy seeks to ensure that new visitor accommodation is directed away from existing concentrations towards other appropriate town centre locations and that these developments are of the highest quality, are inclusive, do not harm the balance and mix of uses and do not negatively impact on residential amenity. The policy acknowledges the role of other forms of visitor accommodation in meeting the demand for visitor accommodation but seeks to ensure that they do not compromise the supply of conventional housing.

Given the existing concentrations of hotel rooms and the pipeline of new rooms in Waterloo and in accordance with the Draft London Plan, additional visitor accommodation in Waterloo will not be supported. In the Vauxhall Opportunity Area the policy seeks to ensure that there is not an overconcentration of visitor accommodation in the area and that the size and scale of a hotel proposal is appropriate to its location. The policy supports strategically-significant serviced visitor accommodation in the Vauxhall Opportunity Area alongside smaller scale provision in those parts of Vauxhall outside of the Opportunity Area but within the Central Activities Zone so long as a proposal does not result in the intensification of the provision of serviced accommodation, result in the loss of office space, be located in a wholly residential street or predominantly residential neighbourhood; and results in the provision of more than 1282 net additional serviced bedspaces between 2019/20 and 2034/35.

Outside of Waterloo and Vauxhall Opportunity Areas, other forms of visitor accommodation will be directed towards major and district town centres where they are well connected by public transport, in accordance with the Draft London Plan and the National Planning Policy Framework.

Introduction

- 1.1. London is the second most visited city in the world, with 31.5 million overnight visitors (domestic and international) in 2015. Lambeth is home to many top visitor attractions including the London Eye, the Southbank Centre, National Theatre, London Dungeons and London Aquarium as well as newer tourist destinations like Brixton.
- 1.2. The Draft London Plan 2017 (as amended August 2018) estimates London will need to build an additional 58,000 bedrooms of serviced visitor accommodation between 2015 and 2041, which is an average of 2,230 bedrooms per year. Unlike the London Plan 2016 (consolidated with alterations since 2011), the Draft London Plan 2017 does not set a target for provision of new visitor accommodation, either London-wide or by borough.
- 1.3. Lambeth has seen a recent increase in the amount of visitor accommodation coming forward in the borough, probably partly due to Lambeth's proximity to nationally renowned cultural attractions such as those within the Southbank, and partly because of the increasing popularity of local attractions within the borough, such as Brixton.
- 1.4. The revised Lambeth Local Plan needs to support hotels and other forms of visitor accommodation while striking the right balance with other much needed uses such as housing and offices.
- 1.5. This topic paper explains the rationale behind the proposed policy approach for hotels and visitor accommodation in the Draft Revised Lambeth Local Plan October 2018. It sets out:
 - an overview of the national, regional and local policy context
 - a summary of the evidence base to both the London Plan and the Local Plan
 - a summary of the Issues consultation feedback on hotels and visitor accommodation
 - the rationale for Draft Revised Lambeth Local Plan policy ED14.

Overview of policy context

2.1. This section summarises the national and regional policy context.

National Planning Policy Framework 2018

2.2. The glossary of the National Planning Policy Framework 2018 (NPPF) defines hotels as a 'main town-centre use'. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

Draft New London Plan

2.3. Policy E10 of the Draft London Plan 2017 (as amended August 2018) states:

- A London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.
- B The special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.
- C A sufficient supply and range of serviced accommodation for business visitors should be maintained.
- CA The provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.
- CB Camping and caravan sites should be supported in appropriate locations.
- D Within the CAZ, strategically important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.
- E In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas where they are well-connected by public transport, particularly to central London.

- F The role of apart-hotels and short-term lettings should be supported whilst ensuring that they do not compromise housing provision (see Policy H11 Ensuring the best use of stock). Through development plan policies, boroughs may address impacts on local amenity caused by short-term lettings.
 - G To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:
 - 1) 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300- 2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; OR
 - 2) 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice.
- 2.4. The supporting paragraphs to policy E10 set out that concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses or erode the mixed-use character of an area should be avoided. It encourages boroughs in outer and inner London beyond the CAZ to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism. The supporting paragraphs also acknowledge that other forms of visitor accommodation such as short-term lets can supplement the supply of serviced accommodation but set out that it is important that this type of accommodation should not compromise the supply of conventional housing and negatively impact on local amenity.
- 2.5. When applied in Lambeth, this Draft London Plan policy means strategically important serviced accommodated should be promoted in Opportunity Areas within the CAZ, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods and subject to the impact on office space and other strategic functions. Outside of the CAZ, hotels should be promoted in town centres.

Evidence base

- 3.1. This section summarises the evidence base to both the Draft New London Plan and Draft Revised Lambeth Local Plan.

GLA Working Paper 88 – Projections of demand and supply for visitor accommodation in London to 2050 (2017)

- 3.2. In April 2017, the GLA published Working Paper 88 – [Projections of demand and supply for visitor accommodation in London to 2050](#). The working paper forms part of the evidence base for the Draft London Plan and contains new data on demand for and supply of serviced visitor accommodation (traditional hotels, B&Bs, guest houses and hostels are considered as ‘serviced accommodation’, where services such as catering and cleaning are provided to guests) in London. It includes an estimate of the net additional number of rooms expected to be needed in London between 2015 and 2041.
- 3.3. The working paper projects that 58,140 net additional serviced visitor rooms will be required across London between 2015 and 2041. The working paper also acknowledges the growing impact of non- serviced accommodation (such as Airbnb) in meeting demand in the capital.

Lambeth Hotels and Other Visitor Accommodation in Lambeth 2018

Serviced visitor accommodation

- 3.4. The council monitors the number and distribution of hotels and other types of visitor accommodation in the borough annually. The most recent information is published in [‘Hotels and Other Visitor Accommodation in Lambeth 2017/2018’](#), which is up to date as of March 2018.
- 3.5. Analysis of the serviced visitor accommodation pipeline shows that:
- In March 2015 there were 4,434 serviced rooms in Lambeth.
 - Since April 2015, 1,009 net additional serviced rooms have been completed in Lambeth.
 - In March 2018, there were 5,479 serviced rooms in the borough and another 909 rooms in the development pipeline (under construction or unimplemented planning permissions).
 - If all of the hotels with planning permission are built, 1,918 net additional services rooms will have been provided in Lambeth since April 2015.

- 3.6. A further update of this analysis will be provided after the end of March 2019, to take account of additional completions and approvals during the 2018/19 financial year.
- 3.7. There is a concentration of existing and new hotel rooms in the Waterloo and Vauxhall Opportunity Areas. As of March 2018, Bishop's ward, which includes the whole of the Waterloo Opportunity Area, contains the highest number of serviced rooms in the borough, with 3518 rooms (68% of total serviced rooms in the borough). At end March 2018, there were a further 234 rooms under construction and an unimplemented permission for another 40 rooms. In the Vauxhall Opportunity Area, as of March 2018, there were an existing 1087 serviced rooms with an additional 594 under construction.

Other forms of visitor accommodation

- 3.8. In addition to serviced rooms, there are other forms of visitor accommodation in Lambeth. These forms of 'non-serviced' visitor accommodation have potential to supplement the demand for additional serviced accommodation identified by the GLA. This includes an estimated 689 student rooms available to visitors during vacation periods. These rooms are located across three different student premises in Lambeth. Given a growing pipeline of purpose-built student accommodation in the borough, this number is expected to increase.
- 3.9. Short-term lets of permanent residential accommodation are increasingly available to visitors through on-line services such as Airbnb, Booking.com, Tripadvisor, HomeAway and FlipKey and, in recent years, the use of this type of accommodation appears to have increased significantly. Data provided by company Airdna suggests that there were only 10 Airbnb rentals listed in Lambeth in 2010¹. In May 2018, Airbnb database data² revealed that 133,600 people visited Lambeth during the 2017 calendar year. These guests originated from 130 different countries. On the 1st January 2018, Airbnb recorded 4,300 active host listings in Lambeth, which is the 9th highest number of listing for all London boroughs. On average these hosts were typically booked for 42 nights during 2017.
- 3.10. Under provisions in the Deregulation Act 2015, residential premises in London can be used as "temporary sleeping accommodation" for up to 90 nights in any calendar year without the need to apply for planning permission for a change use of use to visitor accommodation, if certain conditions are met. As the majority of short-term let hosts do not have planning permission to use their premises beyond the current 90 night limit, the number of short-term lets in the borough constantly fluctuates.

¹ [Airdna](#)

² [Airbnb Database](#) provide publically available Airbnb data

Issues consultation 2017

- 4.1. The Local Plan review Issues consultation took place between 9 October and 4 December 2017. This consultation sought views on 10 key topics for the Local Plan review, one of which was hotels and other forms of visitor accommodation.
- 4.2. Stakeholders were asked the following six questions relating to hotels and visitor accommodation. Analysis of the responses to these questions is set out in section 3.10 of the Lambeth Local Plan Review Issues Consultation Report October 2018.

Short-term lets, like Airbnb and student halls, are a good way to meet demand for visitor accommodation in Lambeth alongside hotels. To what extent do you agree or disagree with this statement?

If evidence shows that Lambeth has enough visitor accommodation to meet predicted future demand, Lambeth Local Plan policy should prioritise other uses, such as housing and workspace, over new hotels. To what extent do you agree or disagree with this statement?

An over-concentration of hotels close to where people live can harm the amenity of residents, for example through the creation of noise, traffic and disturbance. Planning applications for new hotels should be required to assess their impact on residential amenity, including the cumulative impact of each new hotel. To what extent do you agree or disagree with this statement?

New hotels should not be supported in Waterloo because there are enough hotels in that part of Lambeth. To what extent do you agree or disagree with this statement?

Lambeth is experiencing an increase in planning applications for ‘serviced apartments’. These are like very small studio flats with their own kitchen and bathroom and there are concerns they will be used as permanent housing rather than by visitors. We are considering the need for a separate policy to manage this type of application. What are your views on this issue?

Large new hotels should provide high quality employment, training and career opportunities for Lambeth residents. To what extent do you agree or disagree with this statement?

Draft Revised Lambeth Local Plan

- 5.1. Policy ED14 of the Draft Revised Lambeth Local Plan takes account of the latest evidence on the quantity of serviced and non-serviced visitor accommodation in the borough, the Draft London Plan 2017 (as amended August 2018) and Issues consultation feedback.
- 5.2. The policy seeks to ensure that Lambeth contributes to the need for visitor accommodation in London whilst also ensuring that new developments do not result in concentrations of visitor accommodation which can have a negative impact on local areas. It seeks to ensure new visitor accommodation is directed away from existing concentrations, is located in town centre locations and that any new developments are of the highest quality, are inclusive, do not harm the balance and mix of uses and do not negatively impact on residential amenity. It also acknowledges that other forms of visitor accommodation, such as short-term lets, have a role to play in meeting the need for visitor accommodation but should not compromise the supply of conventional housing.
- 5.3. Given the significance of tourism to both London and Lambeth's economy it is important that Lambeth contributes to meeting the accommodation needs of tourists and business visitors. However, Lambeth has a very strong pipeline and stock of new hotel rooms, with the majority of this concentrated in the Waterloo and Vauxhall Opportunity Areas. These Opportunity Areas need to provide for an appropriate mix of Central Activities Zone strategic functions, including new office floorspace and new housing. There is a risk that further hotel development in Waterloo in particular will constrain this potential.
- 5.4. A concentration of visitor accommodation can also change the character of the area. Respondents to the Issues consultation suggested that the character of Waterloo, particularly on Lower Marsh, is changing due to the concentration of hotels in this area and is negatively impacting on local services for residents. Given the existing concentrations of hotel rooms and the pipeline of new rooms in Waterloo (further information in '[Hotels and Other Visitor Accommodation in Lambeth 2017/2018](#)'), it is proposed not to support further hotel development in this part of the borough. This is in accordance with Draft London Plan policy E10 which states that intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.
- 5.5. In accordance with the Draft London Plan, the Draft Revised Lambeth Local Plan policy proposes to support strategically-significant serviced visitor accommodation in the Vauxhall Opportunity Area alongside smaller scale provision in those parts of Vauxhall outside of the Opportunity Area but within the Central Activities Zone so long as a proposal does not result in the intensification of the provision of serviced accommodation, result in the loss of office space, be located in a wholly residential street or predominantly

residential neighbourhood; and results in the provision of more than 1282 net additional serviced bedspaces between 2019/20 and 2034/35. The policy seeks to ensure that there is not an overconcentration of visitor accommodation in the Vauxhall Opportunity Area and that the size and scale of a hotel proposal is appropriate to its location. The cap of net additional serviced bedspaces that will be permitted between 2019/20 and 2034/35 is based on the current anticipated pipeline of new hotel bedspaces in the Vauxhall Opportunity Area.

- 5.6. Outside of Waterloo and Vauxhall Opportunity Areas, the policy aims to direct visitor accommodation to other town centres in the borough and states that other visitor accommodation should be located in major and district town centres where they are well connected by public transport. This is in accordance with the Draft London Plan which states that serviced accommodation should be promoted in town centres, where they are well-connected by public transport and that boroughs should plan proactively to help spread the benefits of tourism. In accordance with the both the NPPF and the Draft London Plan, hotels outside of town centres will not be supported.
- 5.7. Applications for visitor accommodation major and district town centres will be required to demonstrate they are of an appropriate scale and do not harm the balance and mix of uses in an area. This will be assessed on a site by site basis, having regard to the characteristics of an individual locality, existing concentrations of visitor accommodation, the nature and scale of the proposed development. To assist with this assessment, applications will be required to be accompanied by a visitor management plan and the mitigation of negative impacts, including increased demand on local transport facilities and on public services to manage and maintain the public realm, will be secured through planning obligations.
- 5.8. It is necessary to ensure that hotel developments do not have negative impact on residential amenity due to issues such as noise, traffic, parking and servicing. To address this, the policy proposes that applications for new or extended visitor accommodation will be required to assess their impact on residential amenity, including any cumulative impacts taking account of existing hotels nearby. Where necessary, planning obligations will be used to mitigate negative impacts on residential amenity.
- 5.9. Whilst it is acknowledged that alternative forms of visitor accommodation have a role to play in meeting the demand for additional visitor accommodation, the provision of short-term lets should not compromise the supply of conventional housing, proposals for the use of existing C3 accommodation as short-term lets will be considered against Local Plan H3. Proposals for short-stay apartments intended for people visiting London will be considered as C1 visitor accommodation.

- 5.10. New visitor accommodation is often developed on prominent sites in the borough. It is therefore particularly important for visitor accommodation to make a positive contribution to the townscape and to ensure that all hotel bedrooms benefit from natural daylight.