

# Planning for the future

Published 6 August 2020

Ministry of Housing, Communities & Local Government

## COMMENTS by

### South Bank and Waterloo Neighbours

October 2020

#### About us

South Bank and Waterloo Neighbours (SoWN) is the community body that represents almost 9,000 residents, 60,000 workers, 1,500 businesses of all sizes and a large student population in the area covered by the South Bank and Waterloo Neighbourhood Plan. The area has a GVA of 5 billion pounds - in excess of the city of York.

The Neighbourhood Plan for South Bank and Waterloo was produced by the efforts of over five hundred contributors from the residential and business communities from early 2013 onwards. A referendum of 8000 constituents approved the plan by a ratio of 90%:10% on October 24<sup>th</sup> 2019. The Examiner commented that the Plan showed “extensive community engagement, well-researched supporting evidence and provides a distinctive set of local policies, relevant to the needs of the area”.

The final version of the plan was approved by the Cabinet of the London Borough of Lambeth on 16 December 2019, and by the Cabinet and the Council Assembly of the London Borough of Southwark on 21 January 2020 and 25 March 2020 respectively.

Many of those who contributed to the Plan through interviews and facilitated workshops have lived or worked in the area for decades. In becoming involved they showed a shared commitment to the improvement of their neighbourhood which reflects the area’s unique history of local activism, leading to the establishment of Coin Street Community Builders and many other housing co-ops, a riverside park managed by local trustees, as well as locally led regeneration programmes and services.

The time the Plan took to emerge reflects not only the indefatigability of its supporters, but also the complexity of neighbourhood planning in the city environment, where boundaries are not obvious, where local authorities are planning in parallel, and particularly where there is a large population facing the challenge of extensive development. It is significant that this document is both the first cross-borough Neighbourhood Plan, and the first in inner London south of the river, to be approved since the Localism Act introduced the concept in 2011. It is a document that will provide all sections of the community with support over the fifteen years of its life.

---

#### South Bank & Waterloo Neighbourhood Forum Steering Group

John Langley  
Chair  
jlangley@nationaltheatre.org.uk

David Clarson  
Secretary  
davidclarson@walpolehouse.co.uk

Giles Goddard  
Treasurer  
giles@stjohnswaterloo.org

### **About the area**

The area covered by the Southbank and Waterloo Neighbourhood Forum encompasses a unique mix of culture, commerce, education, healthcare and tourism interwoven with a vibrant resident population.

It sits within the Central London Activity Zone and contains in the Southbank, London's primary cultural hub and second most popular tourist destination, and in Waterloo, the busiest railway station in the UK, with over 100m commuters a year.

And although the neighbourhood contains nine conservation areas, and a large number of heritage assets, including nationally significant Grade 1 listed buildings, it has also been the site of very large, successful developments.

The ways in which residents and businesses participate in the life of the community (including consultations, campaigns and community meetings such as the South Bank Forum and Waterloo Community Development Group) has helped ensure that development takes place in an environment where local views can be voiced - sometimes to effect - alongside wider strategic interests.

The local community has continually been proactive in seeking and encouraging new housing to be built in the area, and it has been possible within the current regime to deliver new housing in this dense neighbourhood, including at the Shell centre, which delivered a windfall of over 800 housing units in a mixed-use development.

Applications currently in progress include the IBM and ITV buildings on the River Thames, the Waterloo Estate opposite Waterloo Station and the Royal Street development, opposite the site of St Thomas' hospital. Upcoming proposals, including the Oasis Academy Johanna site, have the potential to deliver more much needed housing in the area.

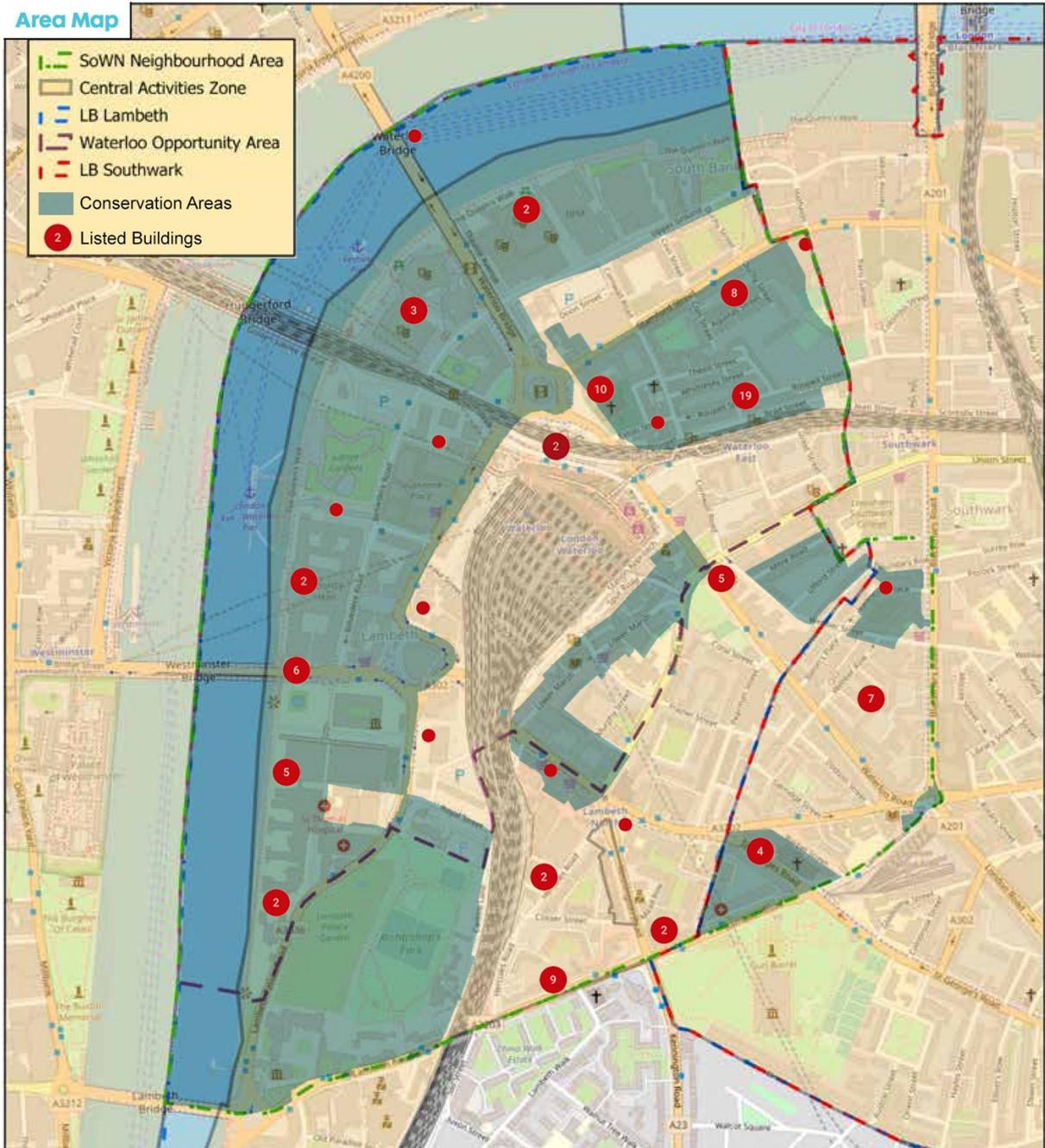
---

**South Bank & Waterloo Neighbourhood Forum Steering Group**

John Langley  
Chair  
jlangley@nationaltheatre.org.uk

David Clarson  
Secretary  
davidclarson@walpolehouse.co.uk

Giles Goddard  
Treasurer  
giles@stjohnswaterloo.org



The contractor or end user is permitted to use paper or digital copies of the map solely for the purpose of assisting with the delivery of those goods or services it has been engaged by Lambeth Council to provide.

© Crown Copyright and database right 2019. Ordnance Survey 100019338  
 Reproduced by permission of Geographers' A-Z Map Co. Ltd. Licence No. C0466  
 © Crown copyright and database rights 2019 Ordnance Survey 100017302

**South Bank & Waterloo Neighbourhood Forum Steering Group**

John Langley  
 Chair  
 jlangley@nationaltheatre.org.uk

David Clarkson  
 Secretary  
 davidclarkson@walpolehouse.co.uk

Giles Goddard  
 Treasurer  
 giles@stjohnswaterloo.org

## Response to the White Paper

The Planning White Paper attempts to fundamentally rewrite the planning system, with a focus on efficiency and centralisation of policy making as the means to speed up the implementation of change and provide greater certainty for developers.

As an established Neighbourhood Forum, we are responding to the White Paper from the perspective of a community which to a large extent has practised the key elements of neighbourhood planning for several decades. We are a key business area, and our neighbourhood planning is particularly inclusive, being undertaken by a 'business-led' Neighbourhood Forum with businesses, residents, and third sector organisations working together for the good of the whole neighbourhood. This is particularly pertinent to a very complex urban area with heavily competing needs: Neighbourhood Planning offers a pro-active and efficient planning framework within which these competing needs are balanced, and new appropriate new development delivered.

As a Neighbourhood Forum it is a difficult task responding to the White Paper because it is so thin on detail about the role that neighbourhood planning would play in the new system and how this role could be effective.

However, it is disturbing that the White Paper doesn't define a meaningful status for Neighbourhood Plans alongside the new Local Plans and that it invites respondents to question whether they should even be retained in *any* form. The lack of clarity could well result in a number of 'not sure' answers to this consultation, which should not be equated with a lack of enthusiasm for what neighbourhood planning represents now.

The development of the Neighbourhood Plan was driven by a desire to create a vision for improving the environment in which we all live and work. It is a concern that the White Paper focuses on the process of the planning system, and appears to lack the vision needed to deliver sustainable and thriving communities.

### **1 Neighbourhood Planning should be retained**

In whatever system results from this White Paper, we believe strongly that the role of neighbourhood planning should be developed to ensure that democratic participation and local control over the planning process is retained and enhanced.

The successes of neighbourhood planning in our area which need to be retained and built upon include:

#### **Inclusivity**

- increasing the inclusivity of the planning process
- empowering the local community
- engaging a wider group of people in the development of their area, not only residents but including businesses and other stakeholders (who have little overt purchase in the planning process, which is overseen by representatives elected by residents)
- communicating better and more directly with and within the local community

---

#### South Bank & Waterloo Neighbourhood Forum Steering Group

- gaining a better understanding of what local people want

#### **Local knowledge and vision**

- drawing on the in-depth knowledge of local people and businesses
- understanding and addressing the fine detail of local issues
- understanding the nuances of the inter-related aspects of a complex area
- building on the history of the area

#### **Constructive connections and efficient outcomes**

- helping towards consensus on complex issues
- creating bonds between local communities and businesses
- providing a bridge between the local authority and local communities
- helping align policy from regional and local authority levels with local concerns
- reducing the potential for disagreement or conflict between the residential and business community, and between them and the local and regional authorities
- encouraging and achieving appropriate sustainable development which contributes to the growth of London

#### **Making a difference**

- understanding local needs
- seizing local opportunities
- focusing spending on the areas that can make the biggest difference
- ensuring that local investment is spent in the most effective way
- recognising particular local requirements, such as the specific need for a genuinely intermediate housing product
- Dealing with the cumulative effects of development proposals and local infrastructure needs that are so often ignored in Local Plans.

## **2 How should the neighbourhood planning process be developed**

There are some simple ways in which the neighbourhood planning process could be developed to build upon its noted strengths:

- Utilise the skills and reach of the Neighbourhood Planning group to reduce stress and workload of Local Authority
- Involve the Neighbourhood Forum in Local Plan development, from the earliest stages
- Involve the Neighbourhood Forum in assessment of Planning Applications from the earliest stages, including a formal role in the pre-application process
- Provide additional funding, to assist in the administration and communication activities of a Neighbourhood Forum
- Support the Neighbourhood Forum in developing digital tool capabilities
- Make it easier to evolve and adapt the Neighbourhood Plan to meet evolving local challenges

### **3 Developer contributions need to be spent locally**

Development can bring benefits to the local area, but it also increases pressure on local facilities and the public realm. It is essential that more is done to ensure that a greater proportion of developer contributions are spent locally, within the same area in which development takes place. Without spending locally to mitigate its impacts, development would potentially add stress to the immediate environment and only provide benefits elsewhere:

- breaking the link between local development and the expenditure of developer contributions could set the local community against development.
- control over the spending of developer contributions motivates local people and businesses to engage with each other and the planning process.
- local communities are better placed than local authorities to identify the expenditure that would make the most difference.
- the importance of contributions towards housing being spent locally was highlighted in the Neighbourhood Plan.

### **4 The White Paper doesn't address the complexity of dense, multi-layered urban centres**

The main focus of the White Paper is in addressing issues at a national level (housing, infrastructure investment and the efficacy of the planning system) and it is impossible to see how the system proposed can be applied to the level of complexity that you find in dense, historic, multi-faceted urban neighbourhoods like Waterloo and Southbank.

- Waterloo has been designated as an Opportunity Area in the London Plan since 2004, one of around 40 such areas across London which provide the reservoir of brownfields sites for significant development in London. An additional 1,500 homes and 15,000 jobs are expected to be developed in our area over the next 15 years.
- Over 800 homes, and a significant quantity of office space, hotel and student accommodation have been developed here over the past decade.
- The high proportion of land protected by conservation areas and listed buildings would mean that the area of Southbank and Waterloo, if defined as a whole, would need to be 'Protected'.
- The only alternative would be for the scale of zones defined as 'Renewal' to be pepper-potted across the area outside Conservation Areas which would be so small that administering them (design guides etc) would be so inefficient that it would make no sense – in fact the current system identifies them as development sites in the Local Plan and provides site specific advice which is entirely sufficient
- Defining the area as 'Protected' in the terms of the White Paper would be contrary to the spirit of optimising the development opportunities that exist in the neighbourhood
- Waterloo accommodates the UK's largest and busiest train station, and is home to Europe's largest arts centre, the kernel of a world-renowned stretch of visitor attractions from the Eye to the Tate and Globe. Each of these different land uses have specific needs and built forms. Area design guides and codes would not be able to address the complexity of issues associates with sites in the Waterloo area.
- A significant body of design guidance already exists for the area, including policies and site designations in the Local Plan, the Waterloo Opportunity Area Planning Framework, the Waterloo SPD, and the Neighbourhood Plan. One of the main roles potentially assigned to

neighbourhood plans (contributing to the production of design codes) would be irrelevant in this area.

- Developing the neighbourhood planning process, alongside a better resource planning application process could create a better and more efficient planning system in this area.

#### **4 The White Paper would limit local democracy and community consultation**

One of the key successes of the Neighbourhood Planning has been to increase the amount of community engagement in planning issues. There is more work to be done in this area, but it is worrying that the impact of the White Paper would be to limit rather than enhance the community's democratic role in the planning process:

- Local Plans allocating sites and granting permissions in principle cut out the possibility of later community involvement.
- The proposed Local Plan preparation process also limits community involvement, allowing only first thoughts at the beginning and later input once the plan is submitted.
- While the current consultation system is imperfect, the existence of a neighbourhood plan and an active neighbourhood forum should be embedded in any proposed reform of the planning system, as an essential mechanism to allow effective community consultation.

**On behalf of South Bank and Waterloo Neighbours**

**29 October 2020**