

8.2 Housing

Key issues

- Due both to lack of security of tenure and a lack of different types of housing stock, many find it hard to stay in Waterloo if they have to downsize or upgrade due to shifts in the size of the family. This affects those in private and social housing and leads to a variety of problems, including overcrowding and loss of social cohesion.
- Affordable housing delivered through development is unlikely to be affordable for most. There is a need to accommodate those on low to middle incomes who work in local sectors that need employees to live close to where they work.
- The area would benefit from additional residents, but too much residential development is not permanently lived in.

Consultation and Evidence

Summary of results of consultation and evidence for Policies P7; Housing is at Appendix 2, page 45.

Policy P7 : Housing

No	Policies
P7	Where, in exceptional circumstances, affordable housing cannot be delivered on site, consideration should be given to making land in the neighbourhood area available to a local designated Community Land Trust to bring forward affordable housing in partnership with a registered housing provider.

Rationale for policy

Policy P7 – A wealth of experience in delivering housing is to be found in the neighbourhood area. Coin Street Community Builders and other coops, housing associations and housing trusts are based in the area and able to deliver housing which best meets local need. SoWN believes that the ethos represented by Coin Street Community Builders should be replicated across other projects, giving local people the power to determine where new homes should be developed and where housing need is most critical.

Mixed use schemes which develop employment opportunities for occupants of the homes are particularly encouraged, to reduce the reliance on public transport for people to get to work, and provide a link between the services that are provided locally and the people who live in the neighbourhood. A community run social enterprise laundrette is a particular aspiration of members of the community.

Housing : Other guidance

1. Residential development should provide high quality homes which are designed to encourage well-maintained permanent use. Housing should not be developed as a liquid asset but to provide mitigation of the UK housing shortage. Housing developments should be marketed to prospective buyers in the UK before they are marketed overseas.
2. SoWN seeks a community solution to the shortage of affordable housing, aiming for a management structure which enables local ownership and oversight of housing. There should be more local control over housing (e.g. co-ops, community land trusts, neighbourhood housing agencies), with the ability to raise additional funding. Developments that create such arrangements will be welcomed by the community.
3. It is essential to encourage innovative new approaches to form, design and management which address local context and local need.
4. Although largely outside the role of the planning system, new approaches are needed to protect tenants in the private rented sector, including both incentives and penalties for landlords. Boroughs should support such measures as set out in the DCLG's Rogue Landlords discussion paper.⁴
5. Following the example of Westminster and Enfield, Lambeth and Southwark should also consider the purchase of properties in the area to house vulnerable people, reducing revenue costs in the long term.
6. A key issue among local people is the extent to which developers are able to meet the targets set by the local authority on affordable housing levels. These are justified on the basis of 'viability assessments' which can assert that development are not viable if they must provide the level of affordable housing the local authority requires. However, if viability assessments underestimate sales values and developments later make a larger profit than estimated, a mechanism should be developed which allows the council to 'claw back' funding retrospectively to deliver more affordable housing. These sums should fund affordable housing in the neighbourhood area where possible. The development proposals of charities and public bodies should be exempt from this obligation.

A number of councils, including Southwark and Lambeth are now producing Viability Assessment SPDs, which seek to address this issue and argue for the clawback mechanism, and that assessments justifying fewer affordable housing units should be open to public scrutiny. The neighbourhood forum supports the objectives of these SPDs.

7. The community believes that early consultation on major developments would enable them to provide helpful advice and reduce the likelihood of objections. To provide a mechanism to strengthen the Councils' commitment to 'front-loading' local consultation, a local 'development review panel' should be established to scrutinise major development plans at pre-planning stage, against their adherence to neighbourhood plan and other matters and make recommendation to the planning committee, including S106 mitigation and CIL spend. This would apply to applications undergoing pre-planning consultation and would be written into planning performance agreements. Plans would be submitted by the Councils to the panel with strict time limits on comments so as not to delay the planning process.

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/450862/Discussion_paper_FINAL.pdf

8.3 Development management

Key issues

- Developers and local authorities are not always aware of the needs of the local community or how development needs to be mitigated.
- The balance between affordable housing, density and other requirements like public realm improvements is not always appropriate to the development context.
- While it is recognised that the neighbourhood is one of high demand for hotels, the area has exceeded targets for hotel uses to 2026 and the area has lost large office and residential sites to hotel use. The community wishes to ensure that any further hotels play an active part in local regeneration.
- Poor design could undermine the successful integration of a large number of well-designed new buildings with heritage assets and conservation areas.

Consultation and Evidence

A summary of results of consultation and evidence for Policies P8 – P9; Development management is at Appendix 3, page 47

Policies P8, P9 : Development management

No	Policies
P8	<p>Any hotel proposal must mitigate the development's impact on the existing dynamics of the residential, business and social communities. The following objectives will be supported :</p> <ol style="list-style-type: none"> 1. Provide as much retail frontage as possible to a high street, where the units made available only have high street access. 2. Provide space that is beneficial and available to the wider community such as 'incubator space', screening room, community meeting and function rooms, fitness suites and swimming pools. 3. Where possible any 'in-house' food and beverage offer should be limited (minibars, bars, restaurants and cafes closed to the public) so that hotel guests are encouraged to use local traders. 4. Developments should continue to engage with local recruitment mechanisms to ensure local candidates are employed wherever possible.
P9	<p>Where they front publicly accessible spaces the ground floor (and any relevant upper floor) elevations of new development shall be treated with a permanent anti-graffiti coating which shall be maintained for the lifetime of the development.</p>

Rationale for policy

Policy P8 – Many local people do not support the further development of hotels in the area, where they are often perceived to intensify the pressure on the area from the visitor economy whilst providing few benefits to the community in the way that housing, office space or retail developments do. The Neighbourhood Plan cannot be used to prevent development of hotels. However it may include guidance to the hospitality industry on best practice examples in the neighbourhood.

Hotels which have been actively supportive of the local community have been welcomed particularly where they provide community benefit, are willing to host community events, recruit from the area and provide facilities for local people to use. SoWn members agree with statements made in the Waterloo SPD, that the development of aparthotels should only be agreed in exceptional circumstances, as there is less potential for the benefits listed above.

Policy P9 – The South Bank and Waterloo Neighbourhood Plan area features two well-known sanctioned graffiti areas, in Leake Street and at the Southbank Centre undercrofts. Graffiti elsewhere in the neighbourhood is removed from the facades of buildings and many developments do not make adequate provision to ensure removal is effective, either by using porous materials or inadequately treating facades. Due to the high local cost of graffiti removal, and the sense of blight non-removal or poor removal creates, developers should adequately treat new buildings to ensure removal can be achieved quickly and effectively.

Development Management: Other guidance

1. Post consent, the panel should be notified of and invited to comment on the discharge of 2 years where a review shows that negative impacts have arisen from the development.
2. The area's heritage is valued and reflects a complex mix of social infrastructure, architectural character and use. The Neighbourhood Plan acknowledges existing conservation and character areas and supports their significance in ensuring the character of the area is respected. High quality design, related to context, is required of all development proposals.

8.4 Retail & work

Key issues

- The balance of retail is under pressure with smaller independent stores, which are seen as integral to the character of the neighbourhood, being replaced by multiples.
- The high number of separate landlords in the area prevents a curatorial approach to retail in the neighbourhood. Where local people desire a mix of retail to suit different needs, owners are prone to seeking the tenant able to pay the highest rent. This can lead to homogenisation, serving commuters and tourists rather than residents or other kinds of shoppers.
- The neighbourhood lacks anchor stores which draw shoppers to the area and can complement independent shops.
- The success of retail in the area will be linked to the development of Waterloo Station and there is a need to involve Network Rail and LCR in discussion to align the long term ambitions of the station operator and the community.
- There is a shortage of office space in the area, and in particular offices that support the needs of young and small businesses i.e spaces which are affordable and flexible in their tenure and size.
- More could be done to ensure local jobseekers benefit from local job creation, unlocked through development.

Consultation and Evidence

Summary of results of consultation and evidence for Policies 10 – 13 ; Retail & work is at Appendix 4, page 48.

Policies P10, P11, P12, P13 : Retail & work

No	Policy
P10	<p>The Neighbourhood Plan supports development that provides retail units in appropriate locations with the following characteristics :</p> <ul style="list-style-type: none"> i. Interiors fitted out to RIBA category B standard and made available for temporary or pop-up use ii. A range of unit sizes including units with shop floors under 20 sq/ m
P11	<p>In Lower Marsh, planning applications will be required to:</p> <ul style="list-style-type: none"> a) Retain an appropriate mix of retail units, taking particular note of the following: <ul style="list-style-type: none"> i) Planning applications involving the loss of an A1 unit will not be supported unless the overall percentage of A1 units remains above 50% following its loss. ii) Planning applications involving the loss of an A3 unit will not be supported unless the overall percentage of A3 units remains above 30% following its loss. b) Retain and enhance the retail use of the frontages, taking particular note of the following: <ul style="list-style-type: none"> i) conversion from retail to residential on these streets will not be permitted, and ii) applications to convert ground floor residential units to A1 or A3 use will be supported* <p>*with the exception of the purpose built housing such as New Cut housing Co-op and Styles House.</p>
P12	<p>Schemes will be encouraged which provide office or workspace with the following characteristics:</p> <ul style="list-style-type: none"> i. Are able to be subdivided to encourage flexible use and co-working and/or ii. Include a range of unit sizes including offices of under 1000 sq/ m and/or iii. Are able to provide accommodation for a range of jobs which are accessible to local people and/or iv. Commit to working with third party employment support providers and local schools to provide work placements, apprenticeships and training support for unemployed people.

P13	<p>The neighbourhood will support proposals which enable physical infrastructure improvements to support the development and servicing of the street market at Lower Marsh, including :</p> <ol style="list-style-type: none"> i. Electricity points ii. Storage iii. Refuse storage iv. Improved lighting v. Improved seating vi. Green infrastructure
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Rationale for policies

Policy P10 – The following facilities to enable temporary or pop-up uses will be encouraged.

- Walls painted white or temporary walls installed to cover up any that are damaged
- Simple overhead lighting ideally spot lighting with different controls so tenants can adjust the lighting state as required
- As much glass frontage as possible
- Power sockets throughout
- WiFi, water and electricity connected
- Access to a toilet
- Buildings insurance

These characteristics were advised after consultation with experts We Are Pop Up, who identify temporary retail spaces for small start-ups at low cost. We Are Pop Up also advise that units should be provided which enable smaller retailers to share space – e.g. a room with a ‘shelf-share’ arrangement or a series of kiosk-style spaces with shared services. The local community would encourage such approaches.

Policy P11 – Lower Marsh – The local community, whilst recognising and welcoming a general shift towards a combination of A3 restaurant uses as well as A1 retail uses, would like to strengthen existing policy to ensure that only a minority of premises are used as services. This preserves the character of the street as a shopping street with daytime as well as evening uses.

Policy P12 – Flexibility is defined both in terms of physical adaptability and length of tenure. There is a need for office spaces which can be adapted as co-working space, shared between a number of smaller companies who are able to economise through shared services such as cleaning. There is also a shortage of large spaces for more established businesses.

Policy P13 – Lower Marsh Market is a valued community asset and a locally-owned not-for-profit company which requires particular and continued support to grow, including investment in infrastructure. It requires particular support as it is an asset in public ownership which can be developed to :

1. Create jobs
2. Drive footfall to the street to support local shops
3. Provide opportunities for training and small business incubation, including via links with schools, colleges and universities
4. Rebalance the local retail offer so as to ensure a greater mix, including provision for the local resident population on a range of incomes
5. Form greater strategic links between the market and other developing parts of Waterloo such as Leake Street, Waterloo Station and a newly developed Johanna site
6. Generate a surplus to support the growth of the market, and the wider regeneration of Waterloo

Retail & work : Other guidance

1. SoWN supports the use of CIL or S106 to subsidise affordable office space for start-ups and enterprise activity – the proximity to local universities provides an opportunity to develop local entrepreneurial talent via subsidies granted by a community body.
2. SoWN supports the use of covenants to restrict the proliferation of specific types of uses in close proximity (e.g. supermarkets, betting shops, coffee shops). Covenants must be agreed by the landowner but are an opportunity to prevent changes of use where such changes would be detrimental to the economic health of the street.
3. Consideration should be given to how changes to business rates allowing for local setting of rates levels can be managed to encourage the establishment of businesses which would serve an unmet need in the community.
4. SoWN supports the Planning Authorities' policies to strengthen protections against the loss of office space in the neighbourhood area, and encourage applications for new provision to come forward. A significant loss of office space threatens the balance of the neighbourhood, including the local retail economy. Central London exemptions to government guidance allowing for office to residential conversion without planning consent are being modified and may erode this further.

8.7 Policy & guidance : Planning gain & mitigation

Key issues

- Policies and guidance relating to the negotiation, collection and defrayal of Section 106 and Community Infrastructure Levy do not relate to a specific theme but are cross cutting. They have been developed by a number of the working groups and a separate group established to consider the defrayal of developer contributions.
- One of the key issues relates to a perceived disconnect between the community and negotiations between the council and developers on how to defray S106 and CIL. Local people assert that they should have a much greater say on how the impact of development should be mitigated since the impact is experienced most locally.
- The London Eye S106 agreement presents an example of the successful local defrayal of revenue S106. A local partnership of businesses, residents and the council determine annually how revenue should be spent according to a set of environmental priorities. A community chest grant fund is managed by a local community organisation and voluntary and community groups can apply for amounts up to £10,000 annually for projects which benefit the neighbourhood. SoWN has proposed a similar mechanism for the defrayal of CIL (see Section 9 - Implementation & Delivery).
- The need for further revenue to maintain infrastructure in the area is paramount. A report prepared by Volterra Consultants for South Bank Employers Group in 2013 and updated in 2016 indicates that declining public investment in management and maintenance of the area has the capacity to limit the economic growth of the area. Consultation with other local delivery groups reflects this view and an appropriate balance must be sought between delivering new infrastructure through capital spend and managing existing through revenue.

Policy P17: Planning gain & mitigation

No	Policy
P17	Subject to requirements and implications of regulations 122 and 123 of the CIL Regulations, where developments create an ongoing and significant cost implication for the management and maintenance of the neighbourhood area outside the development's demise, revenue Section 106 funding to mitigate the impacts should be secured from the development.

Rationale for policy

Policy P17 – Revenue funding is required to protect and maintain capital investment. The London Eye Revenue S106 model is exemplar of local management of services via ongoing funding and a similar mechanism would be appropriate for other developments which significantly increase footfall (and therefore litter, maintenance requirements and security measures).

Revenue funding could be generated either via a commuted sum, proportion of turnover or proportion of service charges on operators occupying new developments. Alternatively developers could provide a revenue generator to the community or Council, such as a retail unit or land.

Planning gain & mitigation : Other guidance

Obligations included within S106 agreements should be reported clearly and transparently by the local planning authority within the committee or delegated report. The obligations should reflect mitigating measures on which the local community have been fully consulted.

Appendix 2.

Summary of results of consultation and evidence for Policies P7 : Housing

South Bank and Waterloo, like the rest of central London, is subject to market forces that are drastically reducing the availability of housing. This was seen as inevitable by many respondents during the consultation and the power of the neighbourhood plan to address these regional issues was accepted as limited. However, local plans and neighbourhood plans are making attempts to develop policy in this area.

South Bank and Waterloo is unusual in comparison with most central London districts because the demographic is enduringly mixed. According to the ONS (2011) Census, 40% of the housing stock remains as social rented:

Tenure	Number
Owned	962
Social rented	1908
Private rented	1549

This includes a prevalence of co-operative and housing association housing in the neighbourhood, including the Coin Street Co-ops, Edward Henry Housing Co-op, New Cut Housing Co-op, Pearman Street Co-op, Peabody, Metropolitan Housing Trust and others. Security of tenure varies but has tended over time toward the less secure. For instance, the sale of Church Commissioners estate to Grainger in 2005/6 resulted in a move away from assured tenancies to assured shorthold tenancies or private sale.

If implemented, the extension of the Right to Buy to housing association tenants and the associated requirement for the disposal of Local Authorities' high value housing to fund the purchase discount is likely to affect Waterloo more deeply than elsewhere in Lambeth and Southwark. This will result in fewer Council or Housing Association homes, but co-op homes will not be affected by the change.

Some affordable housing will be delivered through new development, including at Lollard Street and Leake Street, in association with the Shell/Braeburn and Elizabeth House developments respectively. Extra care housing for the elderly will be provided on the Braeburn site, with a similar scheme earmarked for Gabriel's Wharf.

Sites such as the Guy's and St Thomas' Charity owned Royal Street and the Bourne Capital owned Triangle Site identified in Lambeth's Local Plan are also likely to include a significant housing element, including affordable housing.

In any case, local people, supported by evidence have raised concerns about the likely cost of affordable units where they are let at 80% of market level rents. According to Valuation Office figures cited in an article in **The Guardian** newspaper in February 2014,⁶ renting an affordable two bedroom flat in the Elephant and Castle would require a salary of £44,000, 30% higher than the London median average salary of £30,460.⁶

The affordability issue is more pronounced among certain groups that are increasingly under-represented in central London neighbourhoods such as South Bank & Waterloo. These include those who work in retail, hospitality and healthcare locally, where employers are finding recruitment and retention increasingly difficult where staff cannot afford to live within practical reach of their workplace.⁷

Also, the consultation showed that whilst not demographically underrepresented in the area, housing which is specifically designed for older people is needed. As the local population ages, there are few housing schemes which allow the elderly to remain in the community, and though two are planned, evidence suggests that there is likely to be a demand for further such accommodation.⁸ For the 'ambulant elderly', smaller flats in which to downsize are to be encouraged which both frees up family sized housing in the area and allows older people to remain connected to their community. Consultation evidence suggests that retirees are increasingly moving back to the city for its proximity to culture and healthcare, and the local economy would benefit from such residents.

The final group local people believe should have access to housing in the area is young professionals. In particular, and continuing the theme of cooperatives, housing which is designed to increase communality, particularly between young professionals and the elderly would be welcomed.

Although the methods for building housing to meet the needs of such groups are limited, the policy approaches below reflect the intentions of the neighbourhood plan in seeing a range of housing delivered. SoWN envisages a local role in the delivery and particularly the management of housing to meet the ambitions of the Plan.

⁶ <http://www.theguardian.com/housing-network/2014/feb/03/affordable-housing-meaning-rent-social-housing>

⁷ 2012 Figures, ONS.

⁸ paragraph 4.2.1, page 67 refers to whether lower paid service sector will be sustainable in light of escalating housing costs, and paragraph 8.7 refers to assisting low-middle income households, not limited to key workers

⁹ Paragraph 4.1.1, page 62 and paragraph 8.2, page 97

Appendix 3.

Summary of results of consultation and evidence for Policies P8, P9 : Development management

The South Bank & Waterloo neighbourhood is a mayoral opportunity area and intensification is Planned both in terms of housing and office space over the next decade. There are also increasing numbers of hotels being built in the area.¹⁰

Local views on issues relating to development management reflect an understanding both that some development in the area is inevitable, and that neighbourhood Planning cannot be a tool for resisting it. Campaigns catalysed by Waterloo Community Development Group and others have been effective where development is seen as excessive or under-consulted upon.

During the initial consultation, businesses and residents agreed that the impact of development was a key issue. In the next decade quality of life and business as usual will inevitably be affected by a number of major developments and public realm projects.

30% of the respondents to the pre-submission consultation disagreed with the Plan's conditional support for the creation of further hotels in the area and hotels were regularly raised in comments as an area of concern. Perceived negative impacts were thought to be:

- Loss of other uses, such as residential (or office)
- Proliferation encourages local retailers to change their target demographic, reducing shopping amenities for local residents
- The perception that local residents are not benefited by hotels, or that hotels are not welcoming to locals. That they do not provide 'active' street frontage, or contribute to the life of the high street.
- That their proliferation has disproportionate impact on amenities such as walk in centres, or causes additional burden for public services such as street cleaning etc.
- Design tends to reduce the possibility of green open space
- Taxi and coach pick up and drop off exacerbates local pollution

There is anecdotal evidence of a lack of coordination at planning stage which has led to major projects on adjacent sites being consented, and subsequently developed at the same time. This has led to excessive and protracted noise, dust, road closures, diversions and damage to streets. In the South Bank and Waterloo Neighbourhood it will be particularly necessary to ensure that the above schemes are effectively coordinated to protect the interests of local residents and businesses, with joint strategies dealing with wayfinding, measurement of impact, messaging and information, safety, and access.

The Our South Bank website (www.oursouthbank.com) and Construction Logistics Group are a positive start to dealing with many of these issues, but further resources will be required as development ramps up, and a commitment at planning stage to ensure that developers participate in the process. Construction logistics Plans should furthermore adhere to Transport for London guidance.¹¹

A lack of or inconsistency in consultation was viewed as a key issue and although planning policy cannot dictate consultation processes, the guidance for local authorities and developers which reflects local ambitions in this area is included in the plan. A local mechanism to scrutinise major applications as early as possible has been posited. This would enable a consistent dialogue between the community, the developer and the planning authority which should reduce the likelihood of objections. It would also allow local people to have a say in CIL and Section 106 allocations against the list of projects set out in the neighbourhood Plan.

¹⁰ The report "Hotels and Other Visitor Accommodation in Lambeth 2013 (May 2013)", pages 2-5 states that there were 3,711 rooms, and a further 1,666 in the Planning pipeline at the date of the report. Including additional rooms already built, if all of the permissions were built out, there would be 1,100 more hotel rooms than the London Plan target of 2,000 additional rooms between 2007-2026. There have been a range of consented applications in the plan area in recent years which have permitted change of use from either office or residential. These include Partnership House, Waterloo Road; 100-108 Waterloo Road, Park Plaza Westminster Bridge, Park Plaza County Hall and Park Plaza Waterloo, Marlin Apartments Westminster Bridge Road, Holiday Inn Waterloo, Novotel Waterloo and H10 Waterloo.

¹¹ <https://tfl.gov.uk/cdn/static/cms/documents/construction-logistics-plan-guidance-for-developers.pdf>

Appendix 4.

Summary of results of consultation and evidence for Policies P10, P11, P12, P13 : Retail & work

The problem of retail in the area is closely linked with the change in demographic and lifestyles. The fortunes of Lower Marsh were traditionally linked with residents' use of the market for daily grocery shopping and local office workers taking lunch in its cafes. Such habits are no longer sufficient to sustain high street operations and so local independents are adapting to thrive.

As outlined in national studies of the changing nature of high streets in recent years, the South Bank and Waterloo retail community will need to redefine the offer to move ahead. The Waterloo Retail Study¹² identifies opportunities to create a retail centre with the redevelopment of Waterloo Station and the 'triangle site' opposite. If sufficient supply of modern new units is created to enable multiples to proliferate on Waterloo Road and in the Station itself, the unique but separate shopping environments of Lower Marsh will face less pressure from high rents, which lead to the loss of independents.

Local people support the addition of a supermarket in the right location, and being able to shop locally would help to sustain low car ownership levels in the area.

Planning legislation does not permit councils to dictate the operator of a business, only the nature of the operation, as set out in a list of Use Classes. Banks and estate agents are represented by the same Use Class, as are chain supermarkets and independent clothes shops – for this reason it is not possible through planning policy to prevent a situation which occurred on Waterloo Road in which a Sainsbury's Local, Tesco Metro and M&S Simply Food are situated immediately adjacent to one another.

Additionally, a large majority of the available units are in private ownership and the landlord is the sole determinant of the tenant that leases them. In many cases the landlord will accept the operator who will pay the highest rent. It is only in cases such as Marylebone High Street, where a single landowner – the Howard de Walden Estate – is able to 'curate' the high street offer, choosing a mix of operators to suit a range of needs.

¹² Waterloo Retail Study, The Retail Group 2015

Although it is recognised that the forces of supply and demand drive retail, local people hope that the plan can help to create the conditions to encourage both young start-up businesses and which serve the needs of residents.

Approaches to solving this problem are found in the guidance and projects the neighbourhood forum has developed. The first of these is for a local consortium to purchase one or more buildings for the benefit of the community. Run as social enterprises, these operations will:

- a. Meet local need not currently met by the market (e.g. a community owned launderette)
- b. Provide jobs and volunteer opportunities for local people
- c. Provide genuinely affordable housing above retail units¹³

The second of these is to set up a local retail trust which acts as a low cost lettings agency for participating landlords, providing an agreed rental yield and resulting in a more balanced offer for the neighbourhood. A local trust could also contribute to identifying temporary lessees, pop ups and university spin off businesses in unlet new units.¹⁴

The final issue raised in the retail working group is that of the severe lack of office space.¹⁵ The group advanced policy that committed to supporting the council in its protection of any further losses, particularly of affordable or mid-range office space. In addition, opportunities to create new offices should be taken up, with units in railway arches on Wootton Street providing a good example and where potential exists for more such development.¹⁶

¹³ Paragraph 5.15 of the "London Borough of Lambeth Retail and Town Centre Needs Assessment" states that in some parts of Central London where small shops are in short supply and affordability is a key concern, a policy requiring Planning contributions to provide or support affordable shop units for small or independent retailers may be appropriate

¹⁴ Page 113 of the "London Borough of Lambeth Retail and Town Centre Needs Assessment" reports on the Portas Review, which recommended the provision of low-cost temporary space

¹⁵ Paragraph 4.5 of the "Employment Land Review 2013" states that a number of surveys found "the limited availability of employment land and premises is seen as a key constraint in stimulating new investment." Paragraph 6.38 states that "it will also be important that other parts of the Borough away from the Opportunity Areas provide accommodation that is flexible and affordable and meets the needs of SMEs" – unhelpful as the NP area is an <http://www.lambeth.gov.uk/sites/default/files/EmploymentLandReview2013.pdf>

¹⁶ Paragraph 2.11 of the Waterloo Area SPD states that "smaller businesses and social enterprises will be encouraged. Many railway arches have already been converted to provide for small business use, and there are still many opportunities, particularly in the south of the SPD area." http://www.lambeth.gov.uk/sites/default/files/pl-Waterloo%20Area%20SPD%20-%20Adopted%202013_0.pdf