

Waterloo Community Development Group

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Carl Griffiths
London Borough of Lambeth
Phoenix House
10 Wandsworth Rd
London SW8 2LL

22nd September 2011

Dear Carl

RE: Planning Application 11/02596/FUL, 170 Westminster Bridge Road, London, SE1 7RW

WCDG is funded by Lambeth Council to consult the local Waterloo community on redevelopment proposals and make representations as appropriate.

We **strongly support** this application as we have other various recent applications for this site. The applicants presented their proposals to a WCDG public meeting in January 2010, which was attended by 30 people. The proposals to conserve, refurbish and extend the existing building and provide space for a supermarket at ground floor and an apart hotel at upper floors was strongly supported at the meeting, for a number of reasons.

Firstly there is a longstanding desire for a supermarket in Lower Marsh, and this gateway site was considered by attendees as likely to prove particularly helpful as a potential anchor store bringing shoppers into Lower Marsh. This could prove especially effective given the weaker retail offer at that end of Lower Marsh, and could help attract a significant amount of passing trade from a major London route (Westminster Bridge Rd) into the shopping centre.

Secondly the building is considered a rather fine and increasingly rare example of an Edwardian public house in Waterloo which has retained the integrity of its original form. It is undoubtedly a significant asset in the Conservation Area, but was poorly maintained by the previous occupant (English Language School), particularly at ground floor, and has been vacant and vandalized over recent years. The meeting therefore expressed strong support for a proposal which would treat the original features sympathetically and would restore the building to something of its former glory.

At no point did any local resident raise the issue of loss of community facilities, for the simple reason that as the English Language School it has never been considered a facility for the local community, but, rather, a commercial facility of a slightly dubious nature. (This is not inherent to that particular use – there is no such view attributed locally to the language school in Roupell Street, for example – but, rather, a function of the particular institution which used to operate from the building.)

As the previous use of the site was the English Language School, it would appear that Policy 26 of the saved UDP policies is relevant in determining this application, both in relation to the loss of community facilities in general, and “the loss of an existing school” in particular. However

- There is no existing school which is being lost. The ELS in Waterloo closed some years ago and relocated to West London.
- We concur with the applicant in their planning statement that the part of UDP Policy 26 referring to protection of existing school sites is clearly referring to LEA and other state provided education facilities. This is indicated both by the text (which refers to the local education authority’s Action Plan for Education) and from the discussion developed from the Draft Deposit UDP 2002 and Revised Deposit 2004 (4.13.7) which refers to private schools separately (and does not seek to

protect them), through to the Inspector's Report 2006 (4.95). We therefore do not consider this site to fall within the purposes of Policy 26 in relation to "loss of existing schools".

- With regard to section (c) (i), since the ESL was a commercial institution which did not rely on or serve local demand, there is no educational demand for a "facility of equivalent functionality" to be replaced locally or for planning obligations to be secured to mitigate against its loss.
- With regard to section (c) (ii) there is no local shortage or deficiency of sites for community uses. Indeed, there is a surplus of such sites – see attached map. The council is currently unable to maintain all of the facilities on such sites and has already disposed of one such site (Archbishop Davidson Institute on Lambeth Road) and is in discussion to dispose of another (Living Space, Waterloo Rd). Furthermore, locally within the southern end of Lower Marsh there is an over-provision of D1 uses at ground floor (and a commensurate lack of A1 uses) including the Waterloo Group Practise, the Terence Higgins Trust, the Medicare Centre, and the library.

For all of these reasons Policy 26 has little bearing on the current application, and the loss of D1 is a positive step for the shopping centre, and not one to be resisted.

For all of the above reasons we strongly support this application.

Yours sincerely

Michael Ball
Director