

29 March 2021



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Dear Sir/Madam,

**Draft Revised Lambeth Local Plan: Main Modifications March 2021**

Thank you for giving us the opportunity to comment on the emerging draft Local Plan (Regulation 19).

We write on behalf of Guy's and St Thomas' Foundation which owns a 5.4 acre site in the Waterloo area referred to as the Royal Street site.

Established over 500 years ago, the Foundation's purpose is to improve the health of people in the London boroughs of Lambeth and Southwark, two of the UK's most diverse and deprived areas. This is achieved through the Foundation working with a range of partners to identify, test and scale new approaches to health and healthcare, and by supporting Guy's and St Thomas' NHS Foundation Trust through a combination of fundraising and the Foundation's own philanthropic support.

The Foundation has an endowment of over £800m of assets which forms the backbone of its resources. A considerable part of this comprises the Foundation's property portfolio, which includes a significant land holding in Lambeth, at Royal Street.

Whilst supporting Guy's and St Thomas' NHS Foundation Trust is a central part of the Foundation's work, and the organisations are strategically aligned, it should be noted that as of April 2015, the Foundation became independent and is no longer governed by NHS legislation.

With regards to the Royal Street site the southern portion of the site falls within the Site Allocation 1 Land north and south of and including 10 Royal Street (Founders Place), as set out on in the draft Revised Lambeth Local Plan. The Foundation has engaged in the preceding rounds of public consultation and looks forward to continuing to develop an appropriate framework to create the certainty of outcome required to enable this key site to be brought forward for development with confidence.

In addition to engagement with the Local Plan process most recently at the Examination in Public, the Foundation and its development partner Stanhope has been actively engaged with the Council through pre-application discussions on the re-development of the Royal Street site. Options for optimising the site to deliver a mixed-use scheme are currently being explored.

The Foundation recognises the importance of the planning policy framework to help it and its partners realise their respective ambitions for growth and expansion. In large, the Foundation is supportive of the Council's approach and strategy for growth set out in the draft Revised Lambeth Local Plan and proposed Main Modifications.

However, we maintain our view that a flexible approach to securing affordable workspace is needed to ensure local need is met in the most effective way and that development is not subject to undue constraint.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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More detailed comments on a number of main modifications in respect of affordable workspace are set out below.

### **Inspector's Main Modifications**

#### ***Policy ED2 (part d)***

The previous form of wording stated:

*The affordable workspace should be made available for occupation at the same time of or prior to first occupation as the rest of the B1a floorspace in the development.*

The Inspector has proposed the following main modification:

*The affordable workspace should be made available for occupation within 12 months of first occupation of the non-affordable workspace. In phased developments, the affordable workspace can be delivered on a pro-rata basis, requiring that at least the minimum amount triggered for that phase is delivered and ready for occupation within 12 months of the occupation of the non-affordable workspace element.*

We welcome this modification to the wording which would allow for a more flexible application of the policy on large, multi-phase schemes where office floorspace may be delivered in an incremental manner.

#### ***Paragraph 6.14***

It is proposed that the wording in this paragraph is subject to modifications proposed by both the Council and the Inspector. One of the Inspector's modifications clarifies that the requirement for affordable workspace will only apply to the net uplift in office floorspace as opposed to the gross office floorspace referred to in the previous iteration. We support this modification. However, paragraph 6.14 goes on to suggest that in refurbishment scenarios, the policy will apply to the whole building where there is an increase in quality and rental value. This appears to contradict the first part of paragraph 6.14 which states that the policy will only apply to the net uplift in floorspace in a rebuild or extension to the existing building scenario. We support our development partner Stanhope's observations in this regard and also ask that the Council provides further clarity on its approach. We have previously commented on the potential disincentive to refurbishment that the policy creates and reiterate that point here.

Following the revocation of the B1a use class and introduction of the Class E use class, we note the Council's proposal to use conditions and/or planning obligations to limit uses consented within Class E. While the Council's intention to pursue affordable office space is clear, we restate that the policy ought to allow for the provision of alternative forms of affordable workspace within the wider Class E use class. Alternative uses can meet local need, provide affordable space for local SMEs and support office uses.

### **LBL's Main Modifications**

#### ***Policy ED2 (part a)***

We agree with the Council's proposed modifications to this part of the policy which clarify that the affordable workspace requirements will be applied on the net uplift in office floorspace and not the gross amount.

#### ***Policy ED2 (part b)***

Again, in recognition of new Class E uses, the Council is proposing to delete the reference to "B1 use class" and replace this with "office, light industrial or research and development workspace". We reiterate that the policy ought to allow for more flexibility and the provision of affordable workspace across the Class E suite of uses.

**Policy ED2 (part f)**

We agree with the Council's proposed modification to part (f) of the policy to state that any increased requirement for affordable workspace following a viability review should be capped at the level required by the policy.

**Summary**

In summary, the Charity remains broadly supportive of the aims and objectives of the draft Revised Lambeth Local Plan. We are in agreement with a number of the proposed Main Modifications, specifically that the affordable workspace requirement will now apply to the uplift and not gross quantum of office floorspace. We also agree with modifications that make provision for incremental delivery of affordable workspace on phased schemes and where there has been viability review, cap the amount of any increase at the amount required by policy.

Following the introduction of the Class E uses, there are a number of modifications to remove references to "B1a". The need to remove references to uses that have been revoked is clear. However, we reiterate that the policy ought to allow for the provision of affordable workspace across the Class E use classes to meet the needs of a broader range of locally based SMEs, provide uses that are complimentary to offices and deliver the flexibility intended by the introduction of this new use class.

We look forward to acknowledgement of receipt of this representation. Please do not hesitate to contact us on the details at the head of this letter should you require any further information.

Yours faithfully

A handwritten signature in dark ink, appearing to read "Savills", written in a cursive, flowing style.

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